[redacted]

PUBLIC STORAGE, INC.

701 Western Avenue
Glendale, CA 91201
Tel (818) 244-8080
Ext. 1351 Fax (818) 543-7341

Christopher E. Tucker
Vice President & Real Estate Counsel
Email: ctucker@publicstorage.com

December 7, 2006

VIA FEDEX

Kim Muratore, Case Developer (SFD-7-5)
U.S. EPA, Region 9
75 Hawthorne St.
San Francisco, CA 94105

Re: Response to Information Request Letter for the San Fernando Valley/North Hollywood Superfund Site
PS#29139 – 11620 Sherman Way, North Hollywood, California

Dear Ms. Muratore:

This letter constitutes the response of Public Storage, Inc. to the United States Environmental Protection Agency's Information Request Letter dated October 23, 2006 regarding 11620 Sherman Way, North Hollywood, California. In response to the Information Request Letter, and our subsequent telephone conversation with Michael Massey granting us an extension to respond until December 8, 2006, we advise as follows:

RESPONSE TO INFORMATION REQUEST ("IR")

IR No. 1:

State the full legal name, address, telephone number, position(s) held by, and tenure of the individual(s) answering any of the questions below on behalf of Public Storage, Inc. (the "Company").

Response to IR No. 1:

Karen R. Lore - Closing Agent
701 Western Avenue, Glendale, CA 91201
Tel: (818) 244-8080 Ext. 1162
Tenure: 1.3 years

IR No. 2:

Identify the individuals who are or were responsible for environmental matters at the Company's facility located at 11620 Sherman Way, North Hollywood, California (the "Facility"). Henceforth, the term "Facility" shall be interpreted to include both the real property at 11620 Sherman Way and any improvement thereto. For each individual responsible for environmental matters, provide his/her full name, current or last known address, current or last known telephone number, position titles, and the dates each individual held such position.

Response to IR No. 2:

In the event an environmental matter were to arise at the Facility, it would be handled by the Operations department. The following individuals have had oversight responsibility for pre-existing environmental conditions at the Facility.

Hugh W. Horne - Senior Vice President
FOIA ex 6, Personal Privacy [redacted]
Tenure: unknown

Carl B. Phelps – Senior Vice President
FOIA ex 6, Personal Privacy
Tenure: Jan/98 – Mar 15/04

John S. Baumann - Senior Vice President & Chief Legal Officer
FOIA ex 6, Personal Privacy
Tenure: (Jun/03 - current)

Nargis Choudhry - Vice President & Real Estate Counsel
FOIA ex 6, Personal Privacy
Tenure: (Feb/04 - Jan/06)

Christopher E. Tucker – Vice President & Real Estate Counsel
FOIA ex 6, Personal Privacy
Tenure: 3 months (Aug/06 – current)

IR No. 3:

Explain the Company's present operational status (e.g., active, suspended, defunct, merged, or dissolved).

Response to IR No. 3:

Active/Merged.

IR No. 4:

Provide the date the Company was incorporated, formed, or organized. Identify the State in which the Company was incorporated, formed, or organized.

Response to IR No. 4:

Merger Date: November 15, 1997
Jurisdiction: California

IR No. 5:

Identify the business structure (e.g., sole proprietorship, general partnership, limited partnership, joint venture, or corporation) under which the Company currently exists or operates and identify all former business structures under which it existed or operated since its inception.

Response to IR No. 5:

Business Structure: Corporation
Former Business Structures: Too Many to Name prior to 1995, and irrelevant.

IR No. 6:

For each business structure under which the Company has existed or operated at the Facility, provide the corresponding dates that it existed or operated under that business structure, the name(s) it used, and the Facility addresses at which it operated or was otherwise located.

Response to IR No. 6:

Owner Name: Public Storage, Inc.
Date Owned: March, 2000 - current
Date Operated: January 16, 2001 – current
Facility Addresses: 11620 Sherman Way, N. Hollywood, CA. Public Storage also owns and operates other locations that are too many to name and irrelevant.

Owner Name: North Hollywood Acquisition, LLC
Date Owned: December 23, 1997 – March, 2000
Facility Addresses: 11620 Sherman Way, N. Hollywood, CA

IR No. 7:

Provide a copy of the articles of incorporation, partnership agreement, articles of organization, or any other documentation (together with any amendments) demonstrating the particular business structure under which the Company has existed or operated since its inception.

Response to IR No. 7:

See attached documents 7.1-7.3:

Restated Articles of Incorporation of Storage Equities, Inc.
Merger Agreement between Storage Equities, Inc. & Public Storage Management, Inc.
Articles of Organization of North Hollywood Acquisition, LLC

IR No. 8:

If the Company is or was operating under a fictitious business name, identify the fictitious name and the owner(s) of the fictitious name, and provide a copy of the Fictitious Business Name Statement filed with the county in which the Company is or was doing business.

Response to IR No. 8:

Not applicable.

IR No. 9:

Identify and explain any and all sales of the Company's assets if the sale represented a sale of substantially all of the Company's assets.

Response to IR No. 9:

Not applicable.

IR No. 10:

Identify and explain any investments by the Company in other businesses, companies, or corporations equating to 5% or more of that other business, company, or corporation from the formation of the Company to the present.

Response to IR No. 10:

We object to providing the requested information at this time on the grounds of relevance and undue burden. There are too many to name.

IR No. 11:

List the names, titles, telephone number(s), and current or last known addresses of all individuals who are currently or were officers and/or owners of the Company during any time that the Company was operating at the Facility, regardless of the business structure under which the Company is or was operated. Provide documentation of both the percentage of each individual's current or former ownership interest in the Company and the time period(s) during which he/she held this ownership interest.

Response to IR No. 11:

Officers of Public Storage, Inc. from December 23, 1997 - current: see attached documents 11.1 – 11.10.

Owners: We object to providing the requested information at this time on the grounds of relevance and undue burden. We're publicly traded and there are too many to name.

IR No. 12:

Identify the dates the Company, under any of its current or former business structures, owned the Facility. Provide a copy of the title documentation evidencing the Company's ownership of the Facility.

Response to IR No. 12:

See attached response to IR No. 6. See attached documents 12.1 and 12.2.

IR No. 13:

For any period of time in which the Company, under any of its current or former business structures, owned the Facility, provide the name, address, and phone number of any tenant or lessee. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to any other operators at the Facility.

Response to IR No. 13:

We have not had any tenants or lessees who conducted business at the facility. Our customers rent storage space from us only.

IR No. 14:

Provide the dates that the Company, under any of its current or former business structures, operated at the Facility.

Response to IR No. 14:

January 16, 2001 - current.

IR No. 15:

For any period of time in which the Company, under any of its current or former business structures, operated at, but did not own, the Facility, provide the name, address, and phone number of the Facility's owner. Provide a copy of each lease, rental agreement, or any other document that establishes the Company's relationship to the real property owner during the Company's occupancy of the Facility.

Response to IR No. 15:

Not applicable.

IR No. 16:

Identify any individual or entity that owned or operated the Facility prior or subsequent to the Company. For each prior or subsequent owner or operator, further identify:

a. The dates of ownership/operation;
b. The nature of prior or subsequent operations at the Facility;
c. All evidence showing that the prior or subsequent owner or operator controlled access to the property; and
d. All evidence that a hazardous substance, pollutant, or contaminant was released or threatened to be released at the Facility during the period of prior or subsequent ownership or operation.

Response to IR No. 16:

a. Prior to the date of acquisition by North Hollywood Acquisition, LLC., the owner was Allied Signal, Inc., which is now Honeywell International Inc. (ownership period unknown).

b. See documents 16.1-16.3:
April 29, 1997 ENSR Report
October 13, 1997 ENSR Report – Phase 1
December 22, 1997 – ENSR Report – Baseline Assessment

c. We do not have any such evidence.

d. See 16b, above.

IR No. 17:

Provide a complete list of employees who had knowledge of the use of hazardous substances and disposal of wastes at the Facility during any or all of the period of time that the Company operated at or was otherwise associated with the Facility. For each employee listed, provided the following information:

a. The employee's full name;
b. The employee's current or last known address and telephone number, including the last known date on which you believe each address and telephone number was current;
c. The dates that the employee worked at the Facility;
d. The position(s) the employee held under any of the Company's business structures; and
e. The employee's job title(s) and the corresponding dates during which the Company believes that the employee would have had knowledge of the use and disposal of wastes.

Response to IR No. 17:

None. The Company has not used hazardous substances or disposed of wastes other than standard garbage at the Facility.

IR No. 18:

Describe the size of the Facility, the approximate number of people employed by the Company at the Facility, and the product(s) manufactured or services performed by the Company at the Facility. Describe any significant change in Facility size, the number of employees, or the products manufactured over time.

Response to IR No. 18:

5 people work at the property. The Facility was recently increased in size from 110,804 to 184,204 square feet on a 3.43 acre site. The building footprint did not change; we added stories to the existing building. No products are manufactured at this facility.

IR No. 19:

If any substance containing chromium as a component ("chromium-related substances") was utilized in any of the Company's operations at the Facility, provide a complete description of those operations. Indicate the approximate volume of chromium or chromium-related substances used per month at the Facility, the dates chromium or chromium-related substances were used, and the storage and disposal practices in effect during the Company's operations at the Facility for materials containing chromium. Include documentation evidencing the Company's use of chromium or chromium-related substances.

Response to IR No. 19:

None.

IR No. 20:

Provide a scaled map of the Facility which includes the locations of significant buildings and features. Indicate the locations of any maintenance shops, machine shops, degreasers, liquid waste tanks, chemical storage tanks, and fuel tanks. Provide a physical description of the Facility and identify the following:

a. Surface structures (e.g., buildings, tanks, containment and/or storage areas, etc.);
b. Subsurface structures (e.g., underground tanks, sumps, pits, clarifiers,etc.);
c. Groundwater and dry wells, including drilling logs, date(s) of construction or completion, details of construction, uses of the well(s), date(s) the well(s) was/were abandoned, depth to groundwater, depth of well(s) and depth to and of screened interval(s);
d. Past and present stormwater drainage system and sanitary sewer system, including septic tank(s) and subsurface disposal field(s);
e. Any and all additions, demolitions or changes of any kind of physical structures on, under or about the Facility or to the property itself (e.g., excavation work), and state the date(s) on which such changes occurred; and
f. The location of all waste storage or waste accumulation areas as well as waste disposal areas, including but not limited to dumps, leach fields, and burn pits.

Response to IR No. 20:

a/c/d/e. See documents 20.1-20.2:
ALTA Survey dated December 22, 1997
Grading and Paving Plan dated October 31, 2005
and page A-3 of document 16.2, previously noted above.

b. None.

c. Information about the wells, other than their locations, is unknown.

d. See documents 20.1 and 20.2, above.

e. In 2005, we added several floors to the existing warehouse. The building footprint did not change.

f. None, other than the standard garbage collection area.

IR No. 21:

Provide copies of hazardous material business plans and chemical inventory forms (originals and updates) submitted to city, county, and state agencies.

Response to IR No. 21:

None.

IR No. 22:

Provide a list of all chemicals and hazardous substances used at the Facility, identifying the chemical composition and quantities used. Provide copies of Material Safety Data Sheets for all hazardous substances used.

Response to IR No. 22:

None since acquisition of the property by North Hollywood Acquisition, LLC. See environmental reports 16.1-16.3 with respect to the time period prior to North Hollywood Acquisition, LLC's ownership.

IR No. 23:

Identify and provide the information below for all volatile organic compounds (most notably PCE, TCE; 1, 1-DCE, MTBE; 14-DCA, cis-1,2-DCE; and carbon tetrachloride); Title 22 metals including total and hexavalent chromium; 1,4-dioxane; N-nitrosodymethylamine (NDMA); perchlorate; dioxins and furans, which are or were used at, or transported to, the Facility:

a. The trade or brand name, chemical composition, and quantity used for each chemical or hazardous substance and the Material Safety Data Sheet for each product;
b. The location(s) where each chemical or hazardous substance is or was used, stored, and disposed of;
c. The kinds of wastes (e.g., scrap metal, construction debris, motor oil, solvents, waste water), the quantities of wastes, and the methods of disposal for each chemical, waste, or hazardous substance;
d. The quantity purchased (in gallons), the time period during which it was used, and the identity of all persons who used it; and
e. The supplier(s), and provide copies of all contracts, service orders, shipping manifests, invoices, receipts, canceled checks, or any other documents pertaining to the supply of chemicals or hazardous substances.

Response to IR No. 23:

None since acquisition by North Hollywood Acquisition, LLC. See environmental reports 16.1-16.3 with respect to the time period prior to North Hollywood Acquisition, LLC's ownership.

IR No. 24:

Provide copies of all environmental data or technical or analytical information regarding soil, water, and air conditions at or adjacent to the Facility, including, but not limited to, environmental data or technical or analytical information related to soil contamination, soil sampling, soil gas sampling, geology, water (ground and surface), hydrogeology, groundwater sampling, and air quality.

Response to IR No. 24:

See environmental reports 16.1-16.3, noted above. We received the following reports from Honeywell, which can be provided upon request:

December 7, 2001 – Technical Report & Workplan for Chromium
April 21, 2006 – Quarterly Groundwater Monitoring Report
October 26, 2006 – Quarterly Groundwater Monitoring Report

IR No. 25:

Identify, and provide the following information for, all groundwater wells that are located at the Facility:

a. A map with the specific locations of the Facility groundwater wells;
b. Date the Facility groundwater wells were last sampled;
c. List of all constituents which were analyzed during groundwater sampling events; and
d. All groundwater sampling results, reports of findings, and analytical data.

Response to IR No. 25:

Public Storage does not test any of the groundwater at our facility; testing is being performed by Allied Signal (now Honeywell). The Honeywell Groundwater Monitoring Reports noted in Response to IR No. 24 would provide additional information and can be supplied upon request.

IR No. 26:

Identify all insurance policies held by the Company from the time it commenced ownership of or operations at the Facility until the present. Provide the name and address of each insurer, the policy number, the amount of coverage and policy limits, the type of policy, and the expiration date of each policy. Include all comprehensive general liability policies and "first party" property insurance policies and all environmental impairment insurance. Provide a complete copy of each policy.

Response to IR No. 26:

We object on the basis of relevance at this point in time. We will provide a further response at a later date, should the information become relevant.

IR No. 27:

Provide copies of any applications for permits or permits received under any local, state, or federal environmental laws and regulations, including any waste discharge permits, such as national pollutant discharge elimination system permits.

Response to IR No. 27:

None with respect to the Facility since acquisition by North Hollywood Acquisition, LLC.

IR No. 28:

If the Company discharged any of its waste stream to the sewer at the Facility, provide copies of all permits and all analyses performed on discharged water, and identify all locations where waste streams were discharged.

Response to IR No. 28:

None. The Company has not discharged any waste to the sewer at the Facility.

IR No. 29:

For each waste stream generated at the Facility, describe the procedures for (a) collection, (b) storage, (c) treatment, (d) transport, and (e) disposal of the waste stream.

Response to IR No. 29:

Not applicable.

IR No. 30:

Please provide a detailed description of all pre-treatment procedures performed by the Company on its waste streams at the Facility prior to transport to a disposal site.

Response to IR No. 30:

Not applicable.

IR No. 31:

Please describe the method used by the Company to remove waste streams from sumps at the Facility.

Response to IR No. 31:

Not applicable.

IR No. 32:

Please identify all wastes that were stored at the Facility prior to shipment for disposal. Describe the storage procedures for each waste that was stored prior to disposal.

Response to IR No. 32:

None since acquisition by North Hollywood Acquisition, LLC.

IR No. 33:

Please identify all leaks, spills, or other releases into the environment of any hazardous substances or pollutants or contaminants that have occurred at or from the Facility. In addition, identify and provide supporting documentation of:

a. The date each release occurred;
b. The cause of each release;
c. The amount of each hazardous substance, waste, or pollutant or contaminant released during each release;
d. Where each release occurred and what areas were impacted by the release; and
e. Any and all activities undertaken in response to each release; including the notification of any local, state, or federal government agencies about the release.

Response to IR No. 33:

None since acquisition by North Hollywood Acquisition, LLC. See documents 16.1-16.3 with respect to historical activities.

IR No. 34:

Provide copies of any correspondence between the Company and local, state, or federal authorities concerning the use, handling, or disposal of hazardous substances at the Facility, including but not limited to any correspondence concerning any of the releases identified in response to the previous question.

Response to IR No. 34:

See the attached documents 34.1 – 34.4 from the Regional Water Quality Control Board concerning the use, handling or disposal of hazardous substances either at the Facility or neighboring properties:

August 26, 1997 – Closure Letter to Allied Signal
January 10, 2000 – Information request to North Hollywood Acquisition, LLC
February 21, 2003 – Cleanup & Abatement Order for Honeywell
May 27, 2003 – Comments on Technical Report and Workplan to Honeywell

We trust this is the information you require at this time. Please direct any future correspondence in regard to this response to my attention.

Public Storage, Inc.

By: 

Christopher E. Tucker
Vice President & Real Estate Counsel

CET/kl
Encls.
cc: Karen R. Lore (w/encls)
Craig S. Bloomgarden, Esq. (w/o encls)

EXHIBIT B

A373776

PSI Document 7.1

State of California

OFFICE OF THE SECRETARY OF STATE

CORPORATION DIVISION

I, *MARCH FONG EU*, Secretary of State of the State of California, hereby certify:

That the annexed transcript has been compared with the corporate record on file in this office, of which it purports to be a copy, and that same is full, true and correct.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this

AUG 3 1989

THE GREAT SEAL OF THE STATE OF CALIFORNIA
EUREKA

March Fong Eu

Secretary of State

A373776

ENDORSED
FILE
In the office of the Secretary of State
of the State of California

AUG 1 1989

MARCH FONG EU, Secretary of State

RESTATED ARTICLES OF INCORPORATION OF STORAGE EQUITIES, INC.

B. Wayne Hughes and Obren B. Gerich certify that:

1. They are the duly elected President and Assistant Secretary, respectively, of said corporation.

2. The Articles of Incorporation of said corporation shall be amended and restated to read in full as follows:

I

The name of this corporation is STORAGE EQUITIES, INC.

II

The purpose of this corporation is to engage in any lawful act or activity for which a corporation may be organized under the General Corporation Law of California other than the banking business, the trust company business or the practice of a profession permitted to be incorporated by the California Corporations Code.

III

(a) This corporation is authorized to issue only two classes of shares to be designated respectively "Preferred Stock" and "Common Stock" and referred to herein either as Preferred Stock or Preferred shares or Common Stock or Common shares. The total number of shares which this corporation is

authorized to issue is One Hundred and Ten Million (110,000,000); the number of Preferred shares shall be Fifty Million (50,000,000) of the par value of One Cent ($.01) each and the number of Common shares shall be Sixty Million (60,000,000) of the par value of Ten Cents ($.10) each.

(b) The Preferred shares may be issued from time to time in one or more series. The Board of Directors is authorized to fix the number of shares of any series of Preferred shares and to determine the designation of any such series. The Board of Directors is also authorized to determine or alter the rights granted to or imposed upon any wholly unissued series of Preferred shares including the dividend rights, dividend rate, conversion rights, voting rights, rights and terms of redemption (including sinking fund provisions), the redemption price or prices and the liquidation preference, and, within the limits and restrictions stated in any resolution or resolutions of the Board of Directors originally fixing the number of shares constituting any series, to increase or decrease (but not below the number of shares then outstanding) the number of shares of any such series subsequent to the issue of shares of that series. In case the number of shares of any series shall be so decreased, the shares constituting such decrease shall resume the status which they had prior to the adoption of the resolution originally fixing the number of shares of such series.

IV

(a) The liability of the directors of the corporation for monetary damages shall be eliminated to the fullest extent permissible under California law.

(b) The corporation may indemnify agents of this corporation (as defined in Section 317 of the Corporations Code) for breach of duty to the corporation and its shareholders by bylaw, agreement or otherwise to the fullest extent permitted by California law which may be in excess of that expressly allowed by California law, provided that such indemnification is not expressly prohibited by California law.

3. The foregoing amendment has been approved by the Board of Directors of said corporation.

4. The foregoing amendment has been approved by the required vote of the shareholders of said corporation in accordance with Section 902 of the California General Corporation Law. The total number of outstanding shares entitled to vote with respect to the foregoing amendment was 10,942,616 shares of common stock. The number of shares voting in favor of the foregoing amendment equalled or exceeded the vote

required; the required vote being a majority of the outstanding shares of common stock.

IN WITNESS WHEREOF, the undersigned have executed this Certificate on July 21, 1989.

B. Wayne Hughes
President

Obren B. Gerich
Assistant Secretary

Each of the undersigned declares under penalty of perjury under the laws of the State of California that the matters set forth in the foregoing Certificate are true of his own knowledge. Executed at Glendale, California on July 21, 1989.

B. Wayne Hughes

Obren B. Gerich

A468393
EXHIBIT C

PSI Document 7.2

State of California
SECRETARY OF STATE

CORPORATION DIVISION

I, *BILL JONES*, Secretary of State of the State of California, hereby certify:

That the annexed transcript has been compared with the corporate record on file in this office, of which it purports to be a copy, and that same is full, true and correct.

IN WITNESS WHEREOF, I execute this certificate and affix the Great Seal of the State of California this

NOV 2 0 1995

Bill Jones

Secretary of State

A468393

FILED
In the office of the Secretary of State
of the State of California

NOV 16 1995

BILL JONES, Secretary of State

AGREEMENT OF MERGER

THIS AGREEMENT OF MERGER ("Agreement") is entered into as of this 15th day of November, 1995, by and between STORAGE EQUITIES, INC., a California corporation ("SEI"), and PUBLIC STORAGE MANAGEMENT, INC., a California corporation ("PSMI"), with reference to the following:

A. SEI was incorporated in 1980 under the laws of California, and on the date hereof its authorized capital stock consists of (i) 200,000,000 shares of Common Stock, $.10 par value (the "SEI Common Shares"), 42,064,283 of which are issued and outstanding, (ii) 7,000,000 shares of Class B Common Stock, $.10 par value, (the "SEI Class B Shares"), none of which are issued and outstanding, and (iii) 50,000,000 shares of Preferred Stock ($.01 par value), 13,320,000 of which are issued and outstanding (the "SEI Preferred Shares") (collectively, the "SEI Shares").

B. PSMI was incorporated in 1973 under the laws of California, and on the date hereof its authorized capital stock consists of (i) 24,900,000 shares of Voting Common Stock, $.10 par value, of which 215.151 shares are issued and outstanding, (ii) 100,000 shares of Non-Voting Common Stock, $.10 par value, of which 53.919 shares are issued and outstanding, and (iii) 500,000 shares of Preferred Stock, $.10 par value, none of which are issued or outstanding. The outstanding shares of PSMI Voting Common Stock and PSMI Non-Voting Common Stock are jointly referred to herein as the "PSMI Shares."

C. SEI, PSMI and Public Storage, Inc. have entered into an Agreement and Plan of Reorganization dated as of June 30, 1995, as amended as of November 13, 1995 (the "Plan"), setting forth certain representations, warranties, conditions and agreements pertaining to the Merger (as defined below).

D. The Boards of Directors of SEI and PSMI have approved the Plan and this Agreement of Merger, and the requisite shareholder approval has been obtained.

NOW, THEREFORE, the parties agree as follows:

ARTICLE I

1.1 **The Merger.** At the Effective Time (as defined below), PSMI will be merged with and into SEI (the "Merger") and SEI will be the surviving corporation. SEI and PSMI are sometimes collectively referred to herein as the "Constituent Corporations" and SEI, as the surviving corporation of the Merger, is sometimes referred to herein as the "Surviving Corporation."

1.2 **Effective Time.** The Merger shall become effective at the time at which this Agreement, together with the requisite Officers' Certificates of SEI and PSMI, are filed with the California Secretary of State (the "Effective Time").

1.3 **Effect of the Merger.** At the Effective Time:

(a) The separate corporate existence of PSMI shall cease and the Surviving Corporation shall thereupon succeed, without other transfer, to all the rights and property of PSMI and shall be subject to all the debts and liabilities of PSMI in the same manner as if the Surviving Corporation had itself incurred them; all rights of creditors and all liens upon the property of each of the Constituent Corporations shall be preserved unimpaired, provided that such liens upon property of PSMI shall be limited to the property affected thereby immediately prior to the Effective Time; and any action or proceeding pending by or against PSMI may be prosecuted to judgment, which shall bind the Surviving Corporation, or the Surviving Corporation may be proceeded against or substituted in its place.

(b) The Articles of Incorporation of SEI, are amended in the following respect at the Effective Time and thereafter as so amended shall continue to be the Articles of Incorporation of the Surviving Corporation until further amended in accordance with the terms thereof and as provided by law. Article I shall be amended to read as follows:

The name of this corporation is

Public Storage, Inc.

(c) The Bylaws of SEI shall continue to be the Bylaws of the Surviving Corporation until duly amended in accordance with the terms thereof, the Articles of Incorporation of the Surviving Corporation and as provided by law.

(d) The directors of SEI at the Effective Time shall continue as directors of the Surviving Corporation from and after the Effective Time.

ARTICLE II

2.1 **Conversion of PSMI Shares.**

(a) At the Effective Time, by virtue of the Merger and without any action by holders thereof, the PSMI Shares shall be converted into the right to receive 30,000,000 SEI Common Shares (subject to adjustment pursuant to Section 4.2 of the Plan) and 7,000,000 SEI Class B Shares subject to the satisfaction of the conditions set forth in Section 4.1(a) of the Plan. The SEI Shares shall be allocated among the PSMI shareholders in such proportions as they shall agree.

(b) If, prior to the Effective Time, SEI should split or combine the SEI Common Shares, or pay a stock dividend or other stock distribution in SEI Common Shares, or otherwise change the SEI Common Shares into, or exchange SEI Common Shares for, any other securities (whether pursuant to or as part of a merger, consolidation, acquisition of property or stock, separation, reorganization or liquidation of SEI as a result of which the SEI

Shareholders receive cash, stock or other property in exchange for, or in connection with, their SEI Shares (a "Business Combination")), or make any other dividend or distribution (other than cash) on the SEI Common Shares, then the number of SEI Shares will be appropriately adjusted to reflect such split, combination, dividend, distribution, Business Combination or change.

(c) The PSMI Shares to be converted into SEI Shares pursuant to this Section 2.1 shall cease to be outstanding, shall be cancelled and retired and shall cease to exist, and each holder of a certificate or certificates representing any such PSMI Shares (the "Certificates") shall thereafter cease to have any rights with respect to such PSMI Shares, except the right to receive for each of the PSMI Shares, upon the surrender of such Certificate in accordance with Section 2.3 hereof, the SEI Shares specified above.

2.2 **SEI Shares Unaffected.** The Merger shall effect no change in any of the outstanding SEI Common Shares or SEI Preferred Shares and no outstanding SEI Common Shares or SEI Preferred Shares shall be converted or exchanged as a result of the Merger, and no securities shall be issuable with respect thereto. Notwithstanding the foregoing, any SEI Common Shares owned by PSMI at the Effective Time shall be cancelled and retired.

2.3 **Surrender of Certificates.** At the Closing (as defined in the Plan), PSMI shall cause each holder of PSMI Shares to surrender the Certificates representing the PSMI shares to SEI and such holders shall be entitled to receive in exchange therefor certificates representing the number and class of SEI Shares into which such PSMI Shares shall be converted pursuant to Section 2.1 hereof.

2.4 **Fractional Shares.** Notwithstanding any other term or provision of this Agreement, no fractional SEI Shares and no certificates or scrip therefor, or other evidence of ownership thereof, will be issued in the Merger. In lieu of any such fractional share interests, each holder of PSMI Shares who would otherwise be entitled to such fractional share will, upon surrender of the certificate representing such PSMI Shares, receive a whole SEI Share if such fractional share to which such holder would otherwise have been entitled is .5 of an SEI Share or more, and such fractional share shall be disregarded if it represents less than .5 of an SEI Share.

2.5 **Transfer of Shares.** No transfers of PSMI Shares shall be made on the stock transfer books of PSMI after the close of business on the day prior to the Closing.

ARTICLE III

3.1 **Headings.** The descriptive headings contained in the Sections of this Agreement are for convenience of reference only and shall not affect in any way the meaning or interpretation of this Agreement.

3.2 **Parties in Interest.** This Agreement, and the rights, interests and obligations created by this Agreement, shall bind and inure to the benefit of the parties and their respective successors and permitted assigns.

3.3 **Counterparts.** This Agreement may be executed in two or more counterparts, each of which shall be deemed to be an original, but all of which shall be considered one and the same agreement.

3.4 **Further Action.** If at any time after the Effective Time, the Surviving Corporation shall determine that any assignments, transfers, deeds or other assurances are necessary or desirable to vest, perfect or confirm, of record or otherwise, in the Surviving Corporation, title to any property or rights of PSMI or its predecessors, the officers of either Constituent Corporation are fully authorized in the name of PSMI or its predecessors or otherwise to execute and deliver such documents and do all things necessary and proper to vest, perfect or confirm title to such property or rights in the Surviving Corporation.

3.5 **Governing Law.** This Agreement shall be governed by and construed in accordance with the laws of the State of California, without giving effect to the principles of conflict of laws thereof.

3.6 **Abandonment of Merger.** The Constituent Corporations have the power to abandon the Merger by mutual written consent prior to the filing of this Agreement with the California Secretary of State.

IN WITNESS WHEREOF, the parties have entered into this Agreement as of the date first above written.

STORAGE EQUITIES, INC.

By: _____
Harvey Lenkin
President

By: _____
Sarah Hass
Secretary

PUBLIC STORAGE MANAGEMENT, INC.

By: _____
Harvey Lenkin
Chairman of the Board

By: _____
David P. Singelyn
Assistant Secretary

CERTIFICATE OF APPROVAL
OF
AGREEMENT OF MERGER

Harvey Lenkin and Sarah Hass certify that:

1. They are the president and secretary, respectively, of Storage Equities, Inc., a California corporation (the "Corporation").

2. The total number of outstanding shares of the Corporation entitled to vote with respect to the foregoing amendment was forty-two million sixty-four thousand two hundred eighty-three (42,064,283) shares of Common Stock and thirty-one thousand two hundred (31,200) shares of Convertible Participating Preferred Stock.

3. The Agreement of Merger in the form attached was duly approved by the board of directors of the Corporation and by the vote of shares of Common Stock and Convertible Participating Preferred Stock which equalled or exceeded the vote required.

4. The required vote was (i) a majority of the outstanding shares of common stock and (ii) a majority of the outstanding shares of the Common Stock and Convertible Participating Preferred Stock voting together as a class.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this Certificate are true and correct of our own knowledge.

DATE: November 15, 1995.

Harvey Lenkin
President

Sarah Hass
Sarah Hass
Secretary

CERTIFICATE OF APPROVAL
OF
AGREEMENT OF MERGER

Harvey Lenkin and David P. Singelyn certify that:

1. They are the chairman of the board and assistant secretary, respectively, of Public Storage Management, Inc., a California corporation (the "Corporation").

2. The number of outstanding shares of each class of shares of the Corporation is 215.151 shares of Voting Common Stock and 53.919 shares of Non-Voting Common Stock.

3. The Agreement of Merger in the form attached was duly approved by the board of directors of the Corporation and by the unanimous vote of the holders of all of the shares of each class of shares of the Corporation, which vote equalled or exceeded the vote required.

4. The percentage vote required is 100% of the outstanding shares.

We further declare under penalty of perjury under the laws of the State of California that the matters set forth in this Certificate are true and correct of our own knowledge.

DATE: November 15, 1995.

Harvey Lenkin
Chairman of the Board

David P. Singelyn
Assistant Secretary

R:\GOTTLJ\SEIREORG\AGMRSEI2.PSM

EXHIBIT A

State of California
Bill Jones
Secretary of State

PSI Document 7.3

LLC-1

LIMITED LIABILITY COMPANY
ARTICLES OF ORGANIZATION

IMPORTANT - Read the instructions before completing the form.
This document is presented for filing pursuant to Section 17050 of the California Corporations Code.

1. Limited liability company name:
(End the name with "LLC" or "Limited Liability Company". No periods between the letters in "LLC", "Limited" and "Company" may be abbreviated to "Ltd." and "Co.")

   North Hollywood Acquisition, LLC

2. Latest date (month/day/year) on which the limited liability company is to dissolve:

   December 31, 2050

3. The purpose of the limited liability company is to engage in any lawful act or activity for which a limited liability company may be organized under the Beverly-Killea Limited Liability Company Act.

4. Enter the name of initial agent for service of process and check the appropriate provision below:

   Harvey Lenkin , which is

   [xx] an individual residing in California. Proceed to Item 5.

   [ ] a corporation which has filed a certificate pursuant to Section 1505 of the California Corporations Code. Skip Item 5 and proceed to Item 6.

5. If the initial agent for service of process is an individual, enter a business or residential street address in California:

   Street address: 701 Western Avenue, Suite 200

   City: Glendale State: CALIFORNIA Zip Code: 91201

6. The limited liability company will be managed by : (check one)

   [x] one manager [ ] more than one manager [ ] limited liability company members

7. If other matters are to be included in the Articles of Organization attach one or more separate pages.
   Number of pages attached, if any:

8. It is hereby declared that I am the person who executed this instrument, which execution is my act and deed.

   Signature of organizer

   Hugh W. Horne
   Type or print name of organizer

   Date: December 17, 1997

For Secretary of State Use

1019973520 17

FILED
In the office of the Secretary of State
of the State of California

DEC 18 1997

BILL JONES, Secretary of State

OFFICE OF THE SECRETARY OF STATE

LLC-1 Approved by the Secretary of State
Filing Fee $300 9/95

PUBLIC STORAGE, INC.

Board of Directors Meeting

November 11, 1997

RESOLVED: That the following persons be, and they hereby are, elected as officers of this corporation to serve until the next annual meeting of the Board of Directors of this corporation or action in lieu thereof unless, prior to such time, they shall resign or be removed or otherwise be disqualified from serving as officers of this corporation:

Name	Office
B. Wayne Hughes	Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President
John Reyes	Senior Vice President, Chief Financial Officer and Assistant Secretary
Hugh W. Horne	Senior Vice President
Marvin M. Lotz	Senior Vice President
David Goldberg	Senior Vice President, General Counsel and Assistant Secretary
Obren B. Gerich	Senior Vice President and Assistant Secretary
A. Timothy Scott	Senior Vice President and Tax Counsel
David P. Singelyn	Vice President, Treasurer and Assistant Secretary
Sarah Hass	Vice President and Secretary

RESOLVED FURTHER: That each of the persons listed above is designated as an executive officer for purposes of Item 401 of Regulation S-K and is deemed an officer for purposes of Section 16 of the Securities Exchange Act of 1934 and the rules thereunder.

RESOLVED FURTHER: That Harvey Lenkin, President of this corporation, be, and he hereby is, authorized to appoint such other officers as the business of this corporation may require.

RESOLVED FURTHER: That, except for those officers specifically appointed pursuant to the foregoing resolution, all prior corporate officer appointments be, and they hereby are, terminated.

1998 Public Storage Inc. Executive Officers

Name	Office
B. Wayne Hughes	Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President
John Reyes	Senior Vice President and Chief Financial Officer
Marvin M. Lotz	Senior Vice President
Carl B. Phelps	Senior Vice President
David Goldberg	Senior Vice President and General Counsel
A. Timothy Scott	Senior Vice President and Tax Counsel
Obren B. Gerich	Senior Vice President
David P. Singelyn	Vice President and Treasurer
Sarah Hass	Vice President and Secretary

MINUTES OF A SPECIAL MEETING OF BOARD OF DIRECTORS OF PUBLIC STORAGE, INC.

May 6, 1999

RESOLVED: That the following persons be, and they hereby are, elected as officers of this corporation to serve until the next annual meeting of the Board of Directors of this corporation or action in lieu thereof unless, prior to such time, they shall resign or be removed or otherwise be disqualified from serving as officers of this corporation:

Name	Office
B. Wayne Hughes	Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President
John Reyes	Senior Vice President, Chief Financial Officer and Assistant Secretary
Carl B. Phelps	Senior Vice President
Marvin M. Lotz	Senior Vice President
David Goldberg	Senior Vice President, General Counsel and Assistant Secretary
Obren B. Gerich	Senior Vice President and Assistant Secretary
A. Timothy Scott	Senior Vice President and Tax Counsel
David P. Singelyn	Vice President, Treasurer and Assistant Secretary
Sarah Hass	Vice President and Secretary

RESOLVED FURTHER: That each of the persons listed above is designated as an executive officer for purposes of Item 401 of Regulation S-K and is deemed an officer for purposes of Section 16 of the Securities Exchange Act of 1934 and the rules thereunder.

RESOLVED FURTHER: That each of the persons listed above, acting alone, is authorized to enter into, execute and deliver, on behalf of this corporation, agreements, instruments, leases, certificates, documents and letters.

RESOLVED FURTHER: That Harvey Lenkin, President of this corporation, be, and he hereby is, authorized to appoint such other officers as the business of this corporation may require.

RESOLVED FURTHER: That, except for those officers specifically appointed pursuant to the foregoing resolutions, all prior corporate officer appointments be, and they hereby are, terminated.

2000 Public Storage Inc. Executive Officers

Name	Office
B. Wayne Hughes	Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President
John Reyes	Senior Vice President and Chief Financial Officer
Marvin M. Lotz	Senior Vice President
Carl B. Phelps	Senior Vice President
David Goldberg	Senior Vice President and General Counsel
A. Timothy Scott	Senior Vice President and Tax Counsel
Obren B. Gerich	Senior Vice President
David P. Singelyn	Vice President and Treasurer
Sarah Hass	Vice President and Secretary

MINUTES OF A SPECIAL MEETING
OF BOARD OF DIRECTORS OF
PUBLIC STORAGE, INC.

May 10, 2001

RESOLVED: That the following persons be, and they hereby are, elected as officers of this corporation to serve until the next annual meeting of the Board of Directors of this corporation or action in lieu thereof unless, prior to such time, they shall resign or be removed or otherwise be disqualified from serving as officers of this corporation:

Name	Office
B. Wayne Hughes	Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President
John Reyes	Senior Vice President, Chief Financial Officer and Assistant Secretary
Carl B. Phelps	Senior Vice President and General Counsel
Marvin M. Lotz	Senior Vice President
Obren B. Gerich	Vice President (non-executive officer)
David Goldberg	Vice President and Secretary (non-executive officer)
A. Timothy Scott	Senior Vice President and Tax Counsel
David P. Singelyn	Vice President, Treasurer and Assistant Secretary
Bahman Abtahi	Senior Vice President
Ronald L. Harden	Senior Vice President
W. David Ristig	Senior Vice President

RESOLVED FURTHER: That each of the persons listed above, other than David Goldberg and Obren B. Gerich, is designated as an executive officer for purposes of Item 401 of Regulation S-K and is deemed an officer for purposes of Section 16 of the Securities Exchange Act of 1934 and the rules thereunder.

MINUTES OF A SPECIAL MEETING
OF BOARD OF DIRECTORS OF
PUBLIC STORAGE, INC.

May 9, 2002

RESOLVED: That the following persons be, and they hereby are, elected as officers of this corporation to serve until the next annual meeting of the Board of Directors of this corporation or action in lieu thereof unless, prior to such time, they shall resign or be removed or otherwise be disqualified from serving as officers of this corporation:

Name	Office
B. Wayne Hughes	Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President
John Reyes	Senior Vice President, Chief Financial Officer and Assistant Secretary
Carl B. Phelps	Senior Vice President and General Counsel
Marvin M. Lotz	Senior Vice President
Obren B. Gerich	Vice President (non-executive officer)
David Goldberg	Vice President and Secretary (non-executive officer)
A. Timothy Scott	Senior Vice President and Tax Counsel
David P. Singelyn	Vice President, Treasurer and Assistant Secretary
Bahman Abtahi	Senior Vice President
Anthony Grillo	Senior Vice President
W. David Ristig	Senior Vice President

MINUTES OF A SPECIAL MEETING
OF BOARD OF DIRECTORS OF
PUBLIC STORAGE, INC.

May 8, 2003

RESOLVED FURTHER: That the following persons be, and they hereby are, elected as officers of this corporation to serve until the next annual meeting of the Board of Directors of this corporation or action in lieu thereof unless, prior to such time, they shall resign or be removed or otherwise be disqualified from serving as officers of this corporation:

Name	Office
Ronald L. Havner, Jr.	Vice Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President
John Reyes	Senior Vice President, Chief Financial Officer and Assistant Secretary
Marvin M. Lotz	Senior Vice President
Obren B. Gerich	Vice President (non-executive director)

RESOLVED FURTHER: That each of the persons listed above as an executive officer, other than Obren B. Gerich, is designated as an executive officer for purposes of Item 401 of Regulation S-K and is deemed an officer for purposes of Section 16 of the Securities Exchange Act of 1934 and the rules thereunder.

RESOLVED FURTHER: That each of the persons listed above, acting alone, is authorized to enter into, execute and deliver, on behalf of this corporation, agreements, instruments, leases, certificates, documents and letters.

RESOLVED FURTHER: That Harvey Lenkin, President of this corporation and Ronald L. Havner, Jr., Vice Chairman and Chief Executive Officer of this corporation, be, and they hereby are, authorized to appoint such other officers as the business of this corporation may require.

RESOLVED FURTHER: That, except for those officers specifically appointed pursuant to the foregoing resolutions, all prior corporate officer appointments be, and they hereby are, terminated effective March 15, 2003.

The next matter considered by the Board was the reappointment of the Audit Committee.

Upon a motion duly made and seconded, the following resolution was adopted by all directors present:

MINUTES OF A SPECIAL MEETING
OF BOARD OF DIRECTORS OF
PUBLIC STORAGE, INC.

May 6, 2004

RESOLVED FURTHER: That the following persons be, and they hereby are, elected as officers of this corporation to serve until the next annual meeting of the Board of Directors of this corporation or action in lieu thereof unless, prior to such time, they shall resign or be removed or otherwise be disqualified from serving as officers of this corporation:

Name	Office
Ronald L. Havner, Jr.	Vice Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President and Chief Operating Officer
John Reyes	Senior Vice President, Chief Financial Officer and Assistant Secretary
John E. Graul	Senior Vice President
John S. Baumann	Senior Vice President and Chief Legal Officer
Obren B. Gerich	Vice President (non-executive officer)

RESOLVED FURTHER: That each of the persons listed above, other than Obren B. Gerich, is designated as an executive officer for purposes of Item 401 of Regulation S-K and is deemed an officer for purposes of Section 16 of the Securities Exchange Act of 1934 and the rules thereunder.

RESOLVED FURTHER: That each of the persons listed above, acting alone, is authorized to enter into, execute and deliver, on behalf of this corporation, agreements, instruments, leases, certificates, documents and letters relating to the business operations of this corporation for which he is responsible.

RESOLVED FURTHER: That Harvey Lenkin, President of this corporation and Ronald L. Havner, Jr., Vice Chairman and Chief Executive Officer of this corporation, be, and they hereby are, authorized to appoint such other officers as the business of this corporation may require.

RESOLVED FURTHER: That, except for those officers specifically appointed pursuant to the foregoing resolutions, all prior corporate officer appointments be, and they hereby are, terminated.

The next matter considered by the Board was the reappointment of the Equity

MINUTES OF A SPECIAL MEETING
OF BOARD OF DIRECTORS OF
PUBLIC STORAGE, INC.

May 5, 2005

RESOLVED FURTHER: That the following persons be, and they hereby are, elected as officers of this corporation to serve until the next annual meeting of the Board of Directors of this corporation or action in lieu thereof unless, prior to such time, they shall resign or be removed or otherwise be disqualified from serving as officers of this corporation:

Name	Office
Ronald L. Havner, Jr.	Vice Chairman of the Board and Chief Executive Officer
Harvey Lenkin	President and Chief Operating Officer
John Reyes	Senior Vice President, Chief Financial Officer and Assistant Secretary
John S. Baumann	Senior Vice President and Chief Legal Officer
David F. Doll	Senior Vice President
John E. Graul	Senior Vice President
Stephanie G. Heim	Vice President and Secretary (non-executive officer)

RESOLVED FURTHER: That each of the persons listed above, other than Stephanie G. Heim, is designated as an executive officer for purposes of Item 401 of Regulation S-K and is deemed an officer for purposes of Section 16 of the Securities Exchange Act of 1934 and the rules thereunder.

RESOLVED FURTHER: That each of the persons listed above, acting alone, is authorized to enter into, execute and deliver, on behalf of this corporation, agreements, instruments, leases, certificates, documents and letters relating to the business operations of this corporation for which he or she is responsible.

RESOLVED FURTHER: That Harvey Lenkin, President of this corporation and Ronald L. Havner, Jr., Vice Chairman and Chief Executive Officer of this corporation, be, and they hereby are, authorized to appoint such other officers as the business of this corporation may require.

RESOLVED FURTHER: That, except for those officers specifically appointed pursuant to the foregoing resolutions, all prior corporate officer appointments be, and they hereby are, terminated.

MINUTES OF A SPECIAL MEETING
OF BOARD OF DIRECTORS OF
PUBLIC STORAGE, INC.

August 22, 2006

FURTHER RESOLVED: That the following persons be, and they hereby are, elected as officers of this corporation to serve until the next annual meeting of the Board of Directors of this corporation or action in lieu thereof unless, prior to such time, they shall resign or be removed or otherwise be disqualified from serving as officers of this corporation:

Name	Office
Ronald L. Havner, Jr.	Vice Chairman of the Board, President and Chief Executive Officer
John Reyes	Senior Vice President, Chief Financial Officer and Assistant Secretary
John S. Baumann	Senior Vice President and Chief Legal Officer
David F. Doll	Senior Vice President and President, Real Estate Group
John E. Graul	Senior Vice President and President, Self-Storage Operations
Candace Krol	Senior Vice President, with such election effective September 22, 2006
Stephanie G. Heim	Vice President and Secretary (non-executive officer)

FURTHER RESOLVED: That each of the persons listed above, other than Stephanie G. Heim, is designated as an executive officer for purposes of Item 401 of Regulation S-K and is deemed an officer for purposes of Section 16 of the Securities Exchange Act of 1934 and the rules thereunder.

FURTHER RESOLVED: That each of the persons listed above, acting alone, is authorized to enter into, execute and deliver, on behalf of this corporation, agreements,

97 2007668 PSI Document 12.1

RECORDING REQUESTED BY AND
WHEN RECORDED MAIL TO:
North Hollywood Acquisition, L.L.C.
C/O Hugh W. Horne
Senior Vice President
Public Storage, Inc.
P.O. Box 25050
Glendale, California 91221-5050

RECORDED/FILED IN OFFICIAL RECORDS
RECORDER'S OFFICE
LOS ANGELES COUNTY
CALIFORNIA
DEC 23 1997
AT 8 A.M.

MAIL TAX STATEMENTS TO:
Same as above

97420 (99832) SURVEY, [illegible] FEE $10. CODE 9

(Above Space For Recorder's Use Only)

GRANT DEED

FEE $13 Z
3

[illegible] TAX
NOT A PUBLIC RECORD

The undersigned grantor declares:

Documentary Transfer Tax not shown pursuant to Section 11932 of the Revenue and Taxation Code.

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, *ALLIEDSIGNAL INC., a Delaware corporation ("Grantor") hereby GRANTS to NORTH HOLLYWOOD ACQUISITION, L.L.C., a California Limited Liability Company ("Grantee"), that certain real property (the "Property") located in the City of North Hollywood, County of Los Angeles, State of California, more particularly described in Exhibit A attached hereto and incorporated herein by reference, together with all its right, title and interest in and to all buildings and improvements located on the Property.

Grantor further grants to the Grantee all of the Grantor's right, title and interest in and to all easements, privileges and rights appurtenant to the Property and pertaining to, held and enjoyed in connection therewith and all of the Grantor's right, title and interest in and to any land lying in the bed of any street, alley, road or avenue to the mesne line thereof in front of, or adjoining the Property.

DATED: December 18, 1997

ALLIEDSIGNAL INC.

By: [signature]

Its: Director, Real Estate

*as successor by merger to the Bendix Corporation, a California Corporation who acquired title as Bendix Aviation, Ltd.

EXHIBIT A

Parcel B of Parcel Map No. 2128, in the City of Los Angeles, County of Los Angeles, State of California, as per Map filed in Book 30, Page 86, of Parcel Maps, in the Office of the County Recorder of Los Angeles County;

Excepting therefrom Parcels A and B of Parcel Map No. 7108, as per Map filed in Book 267, Pages 14 and 15 of Parcel Maps, in the Office of the County Recorder of Los Angeles County.

92 2007668 12/23/97

STATEMENT OF TAX DUE AND REQUEST THAT TAX DECLARATION NOT BE MADE A PART OF THE PERMANENT RECORD IN THE OFFICE OF THE COUNTY RECORDER PURSUANT TO SECTION 11932 R & T CODE.

TO: REGISTRAR RECORDER COUNTY OF LOS ANGELES

REQUEST IS HEREBY MADE IN ACCORDANCE WITH THE PROVISIONS OF THE DOCUMENTARY TRANSFER TAX ACT THAT THE AMOUNT OF TAX DUE NOT BE SHOWN ON THE ORIGINAL DOCUMENT WHICH NAMES:

ALLIEDSIGNAL, INC., A DELAWARE CORPORATION

(GRANTOR)

NORTH HOLLYWOOD ACQUISITION LLC, A CALIFORNIA LIMITED LIABILITY COMPANY

(GRANTEE)

PROPERTY DESCRIBED IN THE ACCOMPANYING DOCUMENT IS LOCATED IN THE

CITY OF: LOS ANGELES
UNINCORPORATED AREA: _____

THE AMOUNT OF TAX DUE ON THE ACCOMPANYING DOCUMENT IS:
L.A. COUNTY TAX: $2,358.95 (80)
L.A. CITY TAX: $9,650.25 (44)

(XX) COMPUTED ON FULL VALUE OF PROPERTY CONVEYED

(____) OR COMPUTED ON FULL VALUE LESS LIENS AND ENCUMBRANCES REMAINING AT TIME OF SALE.

JENNY W. MA

SIGNATURE OF DECLARANT OR AGENT

COMMERCE ESCROW COMPANY
FIRM NAME

AFTER THE PERMANENT RECORD IS MADE, THIS FORM WILL BE AFFIXED TO THE CONVEYING DOCUMENT AND RETURNED WITH IT.

POSTED

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

State of California

County of Los Angeles

On December 19, 1997 (Date) before me, Chiyoko Wada, Notary Public (Name and Title of Officer (e.g., "Jane Doe, Notary Public"))

personally appeared Philip E. Hammel (Name(s) of Signer(s))

☐ personally known to me – OR – ☒ proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/~~are~~ subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/~~her/their~~ authorized capacity(~~ies~~), and that by his/~~her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

CHIYOKO WADA
Commission # 1072102
Notary Public — California
Los Angeles County
My Comm. Expires Oct 2, 1999

WITNESS my hand and official seal.

Chiyoko Wada
Signature of Notary Public

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Description of Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: _____

☐ Individual
☐ Corporate Officer
Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Attorney-in-Fact
☐ Trustee
☐ Guardian or Conservator
☐ Other: _____

RIGHT THUMBPRINT OF SIGNER
Top of thumb here

Signer Is Representing:

_____

_____

Signer's Name: _____

☐ Individual
☐ Corporate Officer
Title(s): _____
☐ Partner — ☐ Limited ☐ General
☐ Attorney-in-Fact
☐ Trustee
☐ Guardian or Conservator
☐ Other: _____

RIGHT THUMBPRINT OF SIGNER
Top of thumb here

Signer Is Representing:

_____

_____

Prod. No. 5907 Reorder: Call Toll-Free 1-800-876-6827

97 2007668

PSI Document 12.2

Statement to Amended California Form 568
Taxpayer: North Hollywood Acquisition, LLC
FEIN #95-4678877
Secretary of State Number: 199735210017
For Year Ended: 12/31/2003

North Hollywood Acquisition, LLC. (the "Taxpayer") hereby files an amended California Form 568 for year ended 12/31/2003. All of the Taxpayer's property was distributed to its owner, Public Storage, Inc., in March 2000. The income reported in the original Form 568 was filed with error. The Taxpayer therefore respectfully requests for a refund of any overpayment made with the original return.

PS No 99832
(unsigned 5-29-97)

ENSR

Consulting • Engineering • Remediation

1220 Avenida Acaso
Camarillo, CA 93012
(805) 388-3775
FAX (805) 388-3577

April 29, 1997

Mr. Hugh Horne
Public Storage, Inc.
Post Office Box 25050
Glendale, California 91221-5050

Re: **5555-280-001**

Subject: **Environmental Issues Regarding the Allied Signal Facility, Located at 11600 Sherman Way, Los Angeles, California**

Dear Mr. Horne:

At your request, ENSR reviewed numerous existing environmental documents regarding the subject property located in the North Hollywood area of the City of Los Angeles. The subject property is currently vacant but was used by Bendix and Allied Signal for the manufacture of hydraulic and pneumatic valves.

Background

The original facility was constructed in 1941 as a hydraulic testing laboratory for farm equipment. Painting by the use of lacquer dip tanks and chrome plating began onsite in the late 1940s and continued until the early 1990s. A variety of halogenated solvents including perchloroethylene (PCE), trichloroethylene (TCE) and trichloroethane (1,1,1-TCA) have been used in various operations onsite. The subject property is located within the San Fernando Valley Groundwater Basin, North Hollywood Operating Unit Superfund site. This Superfund site includes large areas of the local groundwater basin contaminated with halogenated solvents including TCE and PCE. Numerous soil, groundwater and soil gas study assessments have been conducted by several consultants at the subject property over the period 1984 through 1995. Continued soil gas and groundwater monitoring are ongoing.

General Assessment Findings

The various assessments identified several areas located throughout the subject property that have been contaminated with a variety of total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs) and chromium. More than a dozen impacted areas have

been identified onsite. Most of the areas exhibit both TPH and VOC contamination. On the basis of the available information, it appears that the subject property has been adequately assessed and the extent of contamination associated with former onsite operations has been evaluated with one exception, the extent of chromium contamination in the soil. The various contamination assessments and remediation results are summarized below:

TPH Contamination

TPH contamination associated with former site operations was identified at numerous locations onsite. The lateral and vertical extent of soil contaminated with TPH was adequately identified, indicating that TPH contamination was generally limited to the upper 20 feet of the soil with two exceptions where the soil contamination extended to depths of more than 45 feet. A remedial action plan was prepared and approved by the regulatory agencies and the areas of elevated TPH contamination (greater than 100 mg/kg) were remediated in 1995. Remediation included excavation, onsite treatment by low temperature thermal desorption (LTTD) and replacement onsite as engineered fill. On the basis of the available information, the LTTD remediation appears to have adequately remediated the identified TPH contamination. Confirmatory sampling and analysis of the remedial excavation and the treated soil indicate that the contaminated areas were adequately remediated. The TPH contamination issue appears to have been adequately addressed with no further action (NFA) required. A copy of the NFA letter from the California Regional Water Quality Control Board, Los Angeles Region (RWQCB) was reportedly issued to Allied Signal. A copy of the NFA letter is to be provided to Public Storage and ENSR.

VOC Contamination

Soil contamination by several VOCs associated with former site operations was identified at numerous locations onsite. A variety of VOCs, including PCE, TCE, 1,1,1-TCA among others, were identified in site soils, primarily in the upper 20 feet but extending to 65 feet and at and below 200 feet in various areas. Because vertical gaps appear to exist in the identified VOC contamination, the source of the deeper (65 foot zone) contamination appears to be related to offsite sources and the source of the deepest (200 foot) contamination appears to be the result of offgasing from the underlying (at a depth of

about 225 feet) contaminated groundwater. On the basis of the available information, the subject property does not appear to be a source for the deeper VOC soil gas contamination nor the VOC contamination identified in the regional groundwater.

VOC concentrations detected were generally low and the areas of VOC contamination identified generally coincided with those areas also contaminated with TPH. The majority of the VOC-containing soil was excavated and remediated by the LTTD system, as discussed above. Detected concentrations of VOCs remaining in areas not remediated were low enough to not require remediation. Continuous bi-monthly soil gas monitoring indicated that VOC concentrations in site soil gas remain low and that remediation does not appear to be justified. Allied Signal is currently preparing a letter to the RWQCB requesting closure for the VOC issue at the subject property. On the basis of the available information, it does not appear as if further action regarding the VOC issue is warranted and ENSR recommends no further action.

Chromium Contamination

Soil sampling in the two former plating shop areas has identified the presence of elevated concentrations of total chromium (trivalent and hexavalent), soluble chromium and hexavalent chromium. Based on our review of the data provided, the extent of chromium contamination has been adequately evaluated in the former Plant 2 plating shop area, but the vertical extent of chromium contamination has not been fully evaluated in the former Plant 1 plating shop area. Although the full extent of chromium contamination is not currently known, the available results indicate that those areas exhibiting elevated concentrations of chromium have been identified and that it is unlikely that additional areas exhibiting elevated chromium levels will be identified.

Both areas exhibiting elevated total chromium concentrations were excavated and remediated as part of the TPH remediation program discussed above. The handling of this soil has likely resulted in significant soil mixing and reduction of chromium concentrations in the treated and replaced soils. In addition, according to Mr. Benny Dehghi of Allied Signal, any soils containing elevated chromium concentrations encountered during trenching for the new Public Storage building will be dealt with by Allied Signal. Because this area of the subject property will be filled for development, and because several feet of native soil were removed for remediation of TPH, it does not

appear likely that elevated concentrations of chromium will be encountered during Public Storage construction activities.

Although construction activities will not likely encounter soils exhibiting elevated chromium concentrations, the presence of chromium in the soil at elevated concentrations could represent a long-term liability. ENSR recommends that the Allied Signal offer, regarding the handling of soil to be excavated for Public Storage construction as it entails chromium issues, be formalized as part of the property acquisition documentation. Allied Signal may wish to conduct additional soil sampling and analysis for chromium in the plating shop areas to verify existing chromium concentrations in the soils.

Groundwater Contamination

As mentioned above, the subject property is located in the San Fernando Valley Groundwater Basin, North Hollywood Operating Unit Superfund Site (NPL Site). The regional groundwater in the area has been impacted with a variety of halogenated solvents including TCE and PCE. Because the subject property is known to have suffered releases of TCE and PCE to the soil, it is a candidate for being listed as a responsible party for the NPL site, even though the available information indicates that the subject property releases have not impacted the groundwater. According to Mr. Dehghi, in early 1995 Allied Signal, in conjunction with several other potentially responsible parties, agreed in principal to settle the liability issue with the U.S. EPA. Mr. Dehghi believes this agreement has since been formalized. Documentation regarding potential groundwater liability issues as to the NPL Site was not available for our review. ENSR recommends that Public Storage contact Allied Signal for the appropriate contractual documentation regarding the groundwater liability issue, and whether any settlement agreement would apply to successors and assignees of Allied Signal and Public Storage.

In addition, the subject property is also located in the San Fernando Valley Groundwater Basin State Superfund site, and no information has been provided to ENSR regarding potential site liability as to the State Superfund site. Separate settlement agreements would be required with the Cal/EPA Department of Toxic Substances Control (DTSC) and possibly the RWQCB regarding state liability, in addition to any U.S. EPA agreements. ENSR recommends that Public Storage pursue the potential state liability issues with Allied Signal. ENSR further recommends that, depending on the results of the state and federal site liability issues and the transferability of such protection from Allied Signal to

Public Storage or even its successors, Public Storage may wish to consider entering into separate Prospective Purchaser Agreements with U.S. EPA and Cal/EPA DTSC regarding the subject property.

We trust that the information provided herein is adequate for your needs. If you have any questions, please contact one of the undersigned.

Sincerely,

Diane Henry
Project Manager

Gerald A. Hels, REA
Technical Specialist

ENSR.
Consulting • Engineering • Remediation

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October 13, 1997

Mr. Hugh Horne
Public Storage, Inc.
701 Western Avenue, Suite 200
P.O. Box 25050
Glendale, California 91221-5050

Re: **5555-298-832**

Subject: **Phase I Environmental Due Diligence Examination of a Vacant Lot Located at 11620 Sherman Way, North Hollywood, California**
Public Storage Property No. 99832

Dear Mr. Horne:

ENSR is pleased to transmit this report on the above-referenced property. This Phase I environmental due diligence examination was performed pursuant to ENSR's written proposal. The agreed-upon objective of the investigation was to ascertain the extent to which there is reason to believe that significant hazardous materials or petroleum hydrocarbon contamination may be affecting the subject property. The facts contained herein suggest that the site does present the potential for an environmental liability due to soil and groundwater contamination remaining on and beneath the subject site, as a result of past onsite uses.

Documentation supporting the results of ENSR's investigative effort is found in Exhibit A. The following paragraphs describe the site, review the findings of the database search, summarize our initial findings, provide recommendations regarding the need for future investigative activities, and discuss study limitations.

SITE DESCRIPTION

A summary discussion of the site location, site history, and current uses of the subject site is provided below.

Site Location

The subject site is a rectangular-shaped parcel consisting of approximately 3.5 acres of vacant land located on the south side of Sherman Way, between Lankershim Boulevard to the west and Tujunga Avenue to the east, in North Hollywood, Los Angeles County, California.

The subject site is bordered to the north by Sherman Way, beyond which are Irvine Avenue, United Auto Workers (UAW) Local 179, Wonder/Hostess Bakery Thrift Store, Lemp Avenue, and an office building; to the east by Home Depot; to the south by an unlined stormwater drainage area and Southern Pacific Railroad tracks, beyond which are Bobrick (washroom equipment manufacturer) and Symons Bros. Co. (construction equipment manufacturer); and to the west by Kaiser Permanente.

Site History

Historical information for the subject site is based on a review of aerial photographs, building department records, topographic maps, and previously prepared environmental reports. Sanborn fire insurance map coverage does not exist for the subject site area.

The subject site (currently identified as 11620 Sherman Way) was formerly part of a larger parcel (identified as 11600 Sherman Way), which included land currently located adjacent to the east and west of the subject site (currently occupied by Home Depot and Kaiser Permanent, respectively). This larger parcel was identified in building department records as a "portion of lots 63 and 64, property of Lankershim Ranch Land and Water Co." According to historical information provided in reports reviewed as part of this assessment, land use on and around the site was agricultural up to the 1930s; two dairy farms were reported to be located west of the subject site. The subject site owner was identified as Bendix Aviation Ltd. in building department records from 1941, which is the first year records were found for the subject site property. "Ranch buildings" were identified onsite in a 1941 "Application for the Erection of a Building," dated July 23, 1941. Information provided in this permit indicates the lot size was 680 feet by 1,120 feet. The ranch buildings were demolished to make way for a manufacturing facility that, at one time, included approximately 10 buildings. Site activities and building uses included storage, offices, and manufacturing. The principal industrial operations onsite since 1941 have been the manufacture of hydraulic and pneumatic valves by the Bendix Corporation, which was acquired by Allied-Signal in 1982-83. Various degreasing solvents have been used throughout the facility's history, and plating and other manufacturing operations were conducted through February 1992. All existing buildings (except the one currently occupied by Kaiser Permanente) were demolished and the site cleared in 1993 and the subject site has been vacant since that time.

Description of Current Site Uses

The subject site is currently vacant and undeveloped. There are no products made, processes used, raw materials employed, chemicals and fuels used, or wastes generated onsite.

Assessor Observations

One pole-mounted electrical transformer/capacitor was observed in the southeast corner of the subject site. No staining or other evidence of leaks was observed on the transformer, pole, or ground surface beneath the transformer. According to Jim Kloiber of the City of Los Angeles Department of Water and Power (LADWP), this transformer was placed onsite in 1991 and does not contain polychlorinated biphenyls (PCBs).

Two monitoring wells were observed onsite – one near the northwest corner of the site and one near the south-central portion of the site. Previously prepared environmental reports associated with the subject site indicate these wells were installed in 1991. A third onsite well was identified to be located near the central-west portion of the subject site in these reports; however, it was not observed during ENSR's site visit. Four soil vapor probe wells were also observed onsite – one in the northwest corner, one in the central portion, one in the southwest portion, and one in the south-central portion. The previously prepared environmental reports indicate these wells were installed in 1995. The monitoring wells and soil vapor probe wells were installed as part of numerous soil, groundwater, and soil gas investigations conducted onsite since 1984. A summary of the results of these investigations is provided below, under Site-Related Incidents and Notifications.

An area of depression was observed in the central-west portion of the subject site, between one of the monitoring wells and one of the soil gas probe wells. This depression is presumed to be a result of the excavation of approximately 20 cubic yards of chromium-contaminated soil (see Site-Related Incidents and Notifications, below, for further discussion).

Eight 12- to 18-inch-diameter areas of what appeared to be recently poured cement were observed on the central portion of the subject site, south of the area of depression. These areas are presumed to be associated with former soil borings installed as part of the soil and groundwater investigations previously conducted onsite (see Site-Related Incidents and Notifications, below, for further discussion).

GOVERNMENTAL RECORDS REVIEW

ENSR reviewed a variety of federal and state governmental databases concerning the subject site and surrounding properties (see Exhibit A, Part V).

Site-Related Incidents and Notifications

The subject site was identified (as part of the former Allied Signal/Bendix facility) on the Cortese database of identified hazardous waste and substance sites, on the Resource Conservation and Recovery Information System (RCRIS) database as a large-quantity generator of hazardous waste, and on the Los Angeles County Site Mitigation Complaint Control Log of industrial sites that have had a spill or complaint. It was also identified as a leaking underground storage tank (LUST) site.

Information provided in the Environmental Data Resources (EDR) report indicates 13 underground storage tanks (USTs), ranging in size from 150 gallons to 3,000 gallons were previously located at the Allied Signal/Bendix facility, and that they were installed between 1941 and 1981. Leak detection methods were identified as "stock inventory," "visual," and "GW monitoring well." RCRIS information provided in the EDR report identifies the site owner as The Bendix Corporation and indicates no violations were found. LUST/Cortese information provided in the EDR report indicates a release of solvents was reported on October 15, 1984; soil was the only media impacted; pollution characterization was completed on July 14, 1988; a remediation plan was developed; and contaminated soil was excavated and disposed at an approved site. No other pertinent information was provided in the EDR report.

It should be noted that the Allied Signal/Bendix site is located within the North Hollywood Operable Unit of the North Hollywood Well Field (San Fernando Valley Groundwater Basin) designated by the U.S. Environmental Protection Agency (EPA) on the National Priorities List (NPL). Allied Signal was named by the EPA as a potentially responsible party (PRP), in addition to 12 other parties. The Allied Signal site was investigated under the Well Investigation Program (WIP) conducted by the Regional Water Quality Control Board (RWQCB) with regard to its potential to have contributed to the contamination associated with the NPL site. According to a Second Partial Consent Decree, a settlement was reached between the United States of American and the State of California, plaintiffs, and Allied-Signal, Inc., et al., defendants, with regard to the NPL site. This decree specifically states that "...any change in ownership or corporate or other legal status, including but not limited to any transfer of assets or real or personal property, shall in no way alter the status or responsibilities of the Settling Defendants under this Consent Decree." It also states that "...the Plaintiffs covenant not to sue or to take administrative action against Settling Defendants...with regard to all NHOU [North Hollywood Operable Unit] ROD [Record of Decision" Response Costs and all past Basin Wide Response Costs." The Consent Decree was signed by Allied Signal, Inc., on October 2, 1996. See section 3 below for further discussion of the NPL site.

ENSR reviewed numerous reports, dated from May 1984 through August 1997, regarding soil and groundwater investigative activities conducted at the former Allied Signal/Bendix facility. Individual summaries of each report reviewed are presented in ENSR's Baseline Environmental Condition Assessment letter report (ENSR document number 5555-280-832). A discussion of the findings is provided below.

Soil and groundwater contamination has been identified throughout the subject site. Contaminants of concern were identified as total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and chromium (total and hexavalent).

TPH-impacted soil was identified at numerous locations onsite, which was excavated and treated. A practical action level (PAL) of 1,000 parts per million (ppm) and cleanup level of 100 ppm were approved by the RWQCB. PALs are concentration levels of hydrocarbons in the soil below which the impacted soil may be left in place at the site. Confirmation sampling in onsite impacted areas indicated soil with TPH concentrations above the PAL had been removed and remediated to the cleanup level established. Based on the RWQCB-approved PALs and cleanup levels, TPH-impacted soil with concentrations up to 100 ppm may remain onsite in those areas identified in the northwest, central-west, central, and central-east portions of the subject site, where TPH-impacted soils were identified. According to a letter from the RWQCB to Allied Signal, Inc., dated March 8, 1995, no further action was required by the RWQCB with respect to TPH-impacted shallow soils, which the RWQCB determined had been remediated to acceptable levels.

Volatile organic compounds (VOCs) in soil were detected in "very low to negligible" concentrations in shallow soil confirmation samples with the highest TPH concentrations, indicating that shallow soil containing VOCs in the areas of reported TPH-impacted soil were properly removed and remediated. All soil samples analyzed for VOC concentrations, as part of the TPH-impacted soil cleanup efforts, were found to contain less than 11 parts per billion (ppb). However, the most recent soil gas monitoring (May 1996) results indicate trichloroethylene (TCE) concentrations in deep onsite soil ranging from a low of 14.0 ppb at 100 feet below ground surface (bgs) to a high of 515 ppb at 200 feet bgs. The higher concentrations at greater depths are speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone.

The most recent groundwater monitoring results (third and fourth quarters 1995) indicate TCE, dichloroethene (DCE), and carbon tetrachloride (CCl_4) were detected at concentrations above their respective maximum contaminant levels (MCLs) (5.0, 6.0, and 0.5 ppb). Over the course of groundwater monitoring events conducted at the subject site, concentrations of these contaminants have ranged from 3.6 to 6,400 ppb, 0.31 to 17 ppb, and 0.32 to 5.0 ppb,

respectively. The December 1995 sampling detected TCE, DCE, and CCl_4 concentrations ranging from 25 to 160 ppb, 0.98 to 4.9, and 0.32 to 5.0 ppb, respectively. VOC concentrations in groundwater appear to vary based on the fluctuating groundwater levels and transient nature of groundwater flow beneath the subject site.

Total chromium and chromium VI concentrations up to 1.4 ppm were detected in groundwater samples taken from the central-west portion of the subject site as recently as July 1997, and soil concentrations were reported up to 2,280 ppm for total chromium and 37.5 ppm for chromium VI. The MCL for total chromium in drinking water is 50 ppb. Preliminary remediation goals (PRGs) for total chromium and chromium VI are 450 ppm and 64 ppm, respectively. Chromium VI concentrations exceeding the soluble threshold limit concentration (STLC - California hazardous waste criteria) of 5 ppm were detected in soil at a depth of 45 feet below ground surface (bgs) in the central-west portion of the subject site. Approximately 20 cubic yards of chromium-impacted soil was reported (in an RWQCB closure letter dated August 12, 1997) to have been removed from the subject site; however, this removal is not expected to have addressed the levels of chromium detected up to 45 feet bgs. Significant levels of chromium appear to remain in the central-west portion of the subject site.

According to a *Closure for Allied Signal Western Parcel* letter from the RWQCB to Allied Signal, Inc., dated August 12, 1997, no further soil assessment and remediation activities are required with respect to the Well Investigation Program (WIP) for the subject site. However, the RWQCB did state that, since groundwater samples had detected concentrations of total chromium and chromium VI, at least two additional downgradient groundwater samples must be collected to generate sufficient data to determine onsite groundwater conditions. The RWQCB recommended that these samples be collected in February and July 1998. This letter further stated that although the subject site was exempt from further assessment and remediation requirements with regard to the WIP, requirements of other agencies, such as the U.S. EPA, are not affected by the RWQCB's no further requirements determination, and such agencies may choose to make their own determination concerning the subject site.

Offsite Incidents and Notifications

One NPL site was identified within 1 mile of the subject site, as follows:

- **San Fernando Valley Groundwater Basin (SFVGWB)** is a regional groundwater contamination area located beneath the subject site and other communities located in the San Fernando Valley. This site was also identified on the Comprehensive

Environmental Response, Compensation and Liability Information System (CERCLIS), and Cal-Sites databases.

Information provided in the EDR report indicates a discovery assessment was completed on December 1, 1983; a hazard ranking, screening site inspection, and preliminary assessment were completed on April 1, 1984; final listing on the NPL was completed on June 10, 1986; and a removal investigation was completed on June 17, 1991; and the site is currently under investigation by the government to assess the extent of further action. Groundwater in the area, which is used for drinking water, is reported to be contaminated with chlorinated organics and solvents, such as perchloroethene (PCE), TCE, and chloroform. Groundwater contamination is linked to pre-war, post-war, and current industrialization in the San Fernando Valley, as a result of improper use, storage, and disposal practices. Federal, state, and local agencies have been conducting investigations and cleanup of contaminated groundwater in the SFVGWB since contamination was discovered in 1979. The RWQCB is conducting an investigation into the area-wide sources of groundwater contamination in the SFVGWB, which is overseen by the U.S. Environmental Protection Agency (EPA). Further information provided in the EDR indicates the EPA and the RWQCB are identifying potential sources of contamination and pursuing PRPs that may be responsible for contaminating groundwater. Enforcement agreements and orders have been implemented at numerous specific potential source sites within the SFVGWB. According to a *PCE Contamination in Shallow Zone in Fall 1993* map of the SFVGWB, PCE concentrations range from nondetectable to 5 parts per billion (ppb) in the vicinity of the subject site. A *TCE Contamination in Shallow Zone in Fall 1993* map of the SFVGWB indicates TCE concentrations range from nondetectable to 50 ppb in the vicinity of the subject site. Five ppb is the MCL established for PCE and TCE in drinking water.

No other NPL sites were identified within 1 mile of the subject site, nor were any other CERCLIS sites identified within ½ mile of the subject site. Three state hazardous waste sites (SHWS) were identified within 1 mile of the subject site, all of which are located between ¼ and ½ mile from the subject site and are not expected to have impacted the subject site based their status and distance from the subject site (see Exhibit A, Part V, section 3 for a discussion of these sites).

In addition to the above sources, 10 UST sites were identified within ¼ of the subject site, one of which – Kaiser Permanent – is located adjacent to the west of the subject site. None of the UST sites was identified on a contamination-related database and they are, therefore, not expected to have impacted the subject site. No LUST sites were identified within ¼ mile of

the subject site; however, three were identified approximately ½ mile of the subject site. Based on their distance from the subject site, these three sites are not expected to have impacted the subject site. Six RCRIS sites were identified within ¼ mile of the subject site, one of which – Kaiser Permanente – is located adjacent to the west of the subject site. None of the RCRIS sites was identified on a contamination-related database and they are, therefore, not expected to have impacted the subject site. No other offsite sources of potential concern were identified within 1,000 feet of the subject site. It should be noted that the portion of the former Allied Signal facility currently occupied by Kaiser Permanente has not been closed by the RWQCB with regard to contamination associated with activities previously conducted by Allied Signal at the Kaiser Permanente property.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

Based upon the historical research; review of previously prepared environmental reports; review of governmental waste incident databases and files; interviews conducted with selected individuals and public officials; and the onsite visual inspection of the property, evidence was found to indicate that the potential exists for an environmental liability to be affecting the subject site due to onsite contamination. Actual verification of onsite contamination would require the implementation of a soils and/or groundwater monitoring program. The decision to implement such a program is dependent upon the buyer's and/or lender's respective assessment of the potential business risks involved, along with consideration of the various indemnification agreements, warranties, or representations that may exist between the parties to this transaction. Based solely upon the results of this assessment, the following findings and recommendations are made with regard to the subject site:

- **Petroleum Hydrocarbons** - TPH-impacted soil was reported to have been excavated and treated in accordance with a PAL of 1,000 ppm and cleanup level of 100 ppm, approved by the RWQCB. Confirmation sampling in onsite impacted areas indicated soil with TPH concentrations above the PAL had been removed and remediated to the cleanup level established. According to an RWQCB-issued closure letter, dated March 8, 1995, no further action is required with regard to TPH-impacted soils onsite. ENSR does not recommend further investigation with regard to this finding.

- **Volatile Organics** - VOCs were reported to have been detected in "very low to negligible" concentrations in shallow soil confirmation samples with the highest TPH concentrations, indicating that shallow soil containing VOCs in the areas of reported TPH-impacted soil were properly removed and remediated. However, the most recent soil gas monitoring (May 1996) results indicate TCE concentrations in deep

onsite soil ranging from a low of 14.0 ppb at 100 feet bgs to a high of 515 ppb at 200 feet bgs. The higher concentrations at greater depth are speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone. VOC concentrations in groundwater appear to vary based on the fluctuating groundwater levels and transient nature of groundwater flow beneath the subject site. According to an RWQCB-issued closure letter, dated August 12, 1997, no further soil assessment and remediation activities are required at the subject site. ENSR does not recommend further investigation with regard to the VOC contamination.

- **Chromium** - Total chromium and chromium VI concentrations up to 1.4 ppm were detected in groundwater samples taken from the central-west portion of the subject site as recently as July 1997, and soil concentrations were reported up to 2,280 ppm for total chromium and 37.5 ppm for chromium VI. Chromium VI concentrations exceeding the STLC (California hazardous waste criteria) of 5 ppm were detected in soil at a depth of 45 feet bgs in the central-west portion of the subject site. The approximately 20 cubic yards of chromium-impacted soil reported to have been removed is not expected to have addressed the levels of chromium detected up to 45 feet bgs. Significant levels of chromium appear to remain in the soil and groundwater in the central-west portion of the subject site. As part of their August 12, 1997, closure letter, the RWQCB is requiring additional sampling and analysis with regard to chromium concentrations in groundwater. ENSR recommends that Public Storage meet with Allied Signal and/or the RWQCB regarding development of the site in relation to potential future investigative activities associated with chromium contamination.

- Allied Signal was identified as a PRP with regard to the SFVGWB NPL site. A settlement was reached between Allied Signal and the federal and state agencies regarding impact to groundwater and groundwater remediation of the former Allied Signal/Bendix facility with regard to the NPL site. However, regardless of RWQCB closure, soil and groundwater contamination remain onsite. ENSR recommends that Public Storage consult with legal representation regarding an indemnification of Public Storage with regard to all remaining onsite contamination, and potential associated liabilities and losses.

STUDY LIMITATIONS

This report describes the results of ENSR's initial due diligence investigation to identify the potential presence of a significant hazardous waste or petroleum hydrocarbon contamination problem involving or materially affecting the subject property. In the conduct of this due diligence investigation, ENSR has attempted to independently assess the potential presence of such a problem within the limits of the established scope of work as described in our proposal. However, verification of potentially important facts was not always possible.

The historical information gathered as part of this assessment was obtained from a review of available historical sources and other sources that were deemed pertinent. The standard historical resources detailed in American Society for Testing and Materials (ASTM) Standard E1527-97 were consulted if the assessor determined the documents to be useful and reasonably ascertainable within the scope, cost, and schedule of this assessment.

As with any due diligence evaluation, there is a certain degree of dependence upon oral information provided by facility or site representatives which is not readily verifiable through visual inspection or supported by any available written documentation. ENSR shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representatives at the time this investigation was performed. This investigation took place between September 19 and October 10, 1997, with the onsite investigation occurring on September 26, 1997.

This report and all field data and notes were gathered and/or prepared by ENSR in accordance with the agreed upon scope of work and generally accepted engineering and scientific practice in effect at the time of ENSR's investigation of the site. The statements, conclusions, and opinions contained in this report are only intended to give approximations of the environmental condition of the site. Moreover, there are several major modifications that are inherent in the conduct of this or any other environmental due diligence examination.

- First, it is difficult to predict which, if any of the potential environmental issues identified will become actual problems in the future, for federal and state environmental regulations continually change, as do the enforcement priorities of the applicable governmental agencies involved.

- Second, even for problems currently identified, it is often difficult and sometimes impossible to accurately estimate the liabilities that may be involved in remedying the problem(s), for the legal and technological standards for evaluating, remedying, and allocating liability for environmental issues are in a constant state of change.

Moreover, the liability for remedying environmental problems tends to be highly dependent upon agency negotiations and the sometimes arbitrary and unpredictable nature of agency officials charged with such negotiations.

- Third, there is always the distinct possibility that major sources of future environmental liability have yet to manifest themselves to the point where they are reasonably identifiable through an external investigation such as the one conducted herein.

This report, including all supporting field data, notes, and laboratory data where applicable (collectively referred to hereinafter as "information"), was prepared or collected by ENSR for the benefit of its client, Public Storage, Inc. ENSR's client may release the information to third parties, who may use and rely upon the information at their discretion. However, any use of or reliance upon the information by a party other than specifically named above shall be solely at the risk of such third party and without legal recourse against ENSR, its parent, its subsidiaries and affiliates; or their respective employees, officers, or directors; regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent, or other negligence and strict liability of ENSR), statute, or otherwise. This information shall not be used or relied upon by a party that does not agree to be bound by the above statement.

ENSR is pleased to be of service to Public Storage. If you have any questions regarding our report or findings, please feel free to call either of the undersigned at (805) 388-3775.

Sincerely,

Brenda Miller
Environmental Analyst

Diane Heary for
Jacqueline Breese
Manager, Environmental Management

Attachment: Exhibit A

EXHIBIT A

Supporting Documentation for Environmental Due Diligence

EXHIBIT A
SUPPORTING DOCUMENTATION FOR ENVIRONMENTAL DUE DILIGENCE

PART I: SITE OWNERSHIP AND LOCATION

1. **Site owner:**

   (a) **Name:** Allied Signal, Inc.

   (b) **Address:** 2525 West 190th Street
   Torrance, California 90504-6099

2. **Site operator:**

   (a) **Name:** Not applicable – vacant land

   (b) **Address:** Not applicable - vacant land

3. **Site Location References (Figure 1, Site Location Map):**

   (a) **Address:** 11620 Sherman Way
   North Hollywood, California

   It should be noted that research conducted at the City of Los Angeles Building Department indicates 11620 Sherman Way is the address assigned to the subject site as of February 14, 1997. The subject site was formerly part of a larger parcel associated with 11600 Sherman Way.

   (b) **County:** Los Angeles

   (c) **U.S.G.S. Quad Map:** Van Nuys, California

SOURCE: USGS 7½ Minute Topographic Quadrangle, Van Nuys and Burbank, CA 1966, photorevised 1972.

SCALE

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ENSR Corporation

FIGURE 1

SITE LOCATION MAP

Vacant Lot
11620 Sherman Way
North Hollywood, California

DRAWN: bhm	DATE: September 29, 1997	PROJECT NO.:	REV:
FILE NO.: 298\5555-298.FIG	CHECKED: bhm	5555-298-832	0

PART II: DESCRIPTION AND CHARACTERIZATION OF THE SITE

1. **Physical description of site (Figure 2, Site Plan):**

   (a) **Site acreage:** The subject site consists of approximately 3.5 acres.

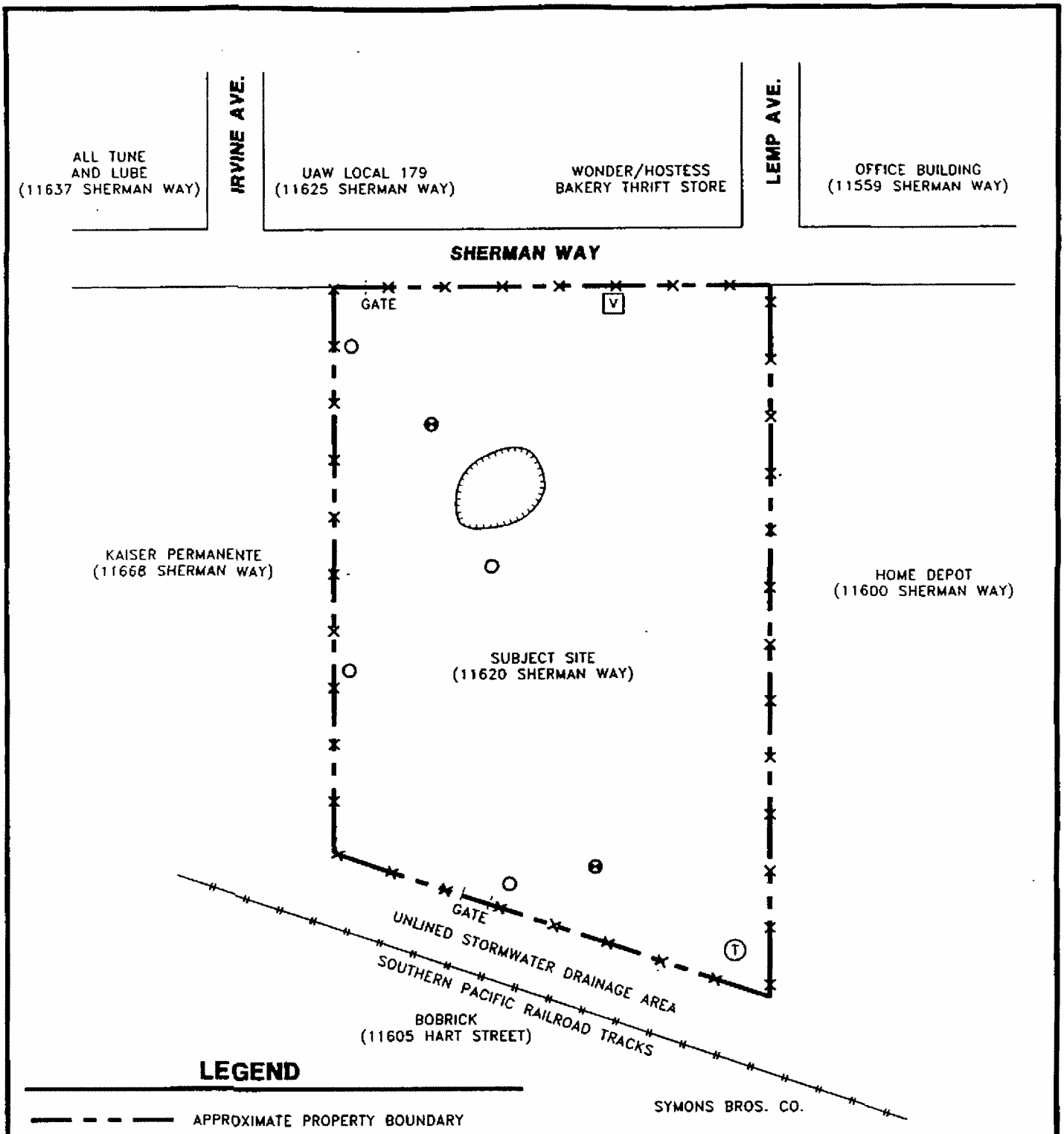
   (b) **Estimated percent of site covered by buildings and pavement:** There are no buildings or pavement located onsite.

   (c) **Site and building layout:** The subject site is a rectangular-shaped parcel of land located on the south side of Sherman Way, between Lankershim Boulevard to the west and Tujunga Avenue to the east, in North Hollywood, Los Angeles County, California. The subject site is vacant and undeveloped.

   The subject site is bordered to the north by Sherman Way, beyond which are Irvine Avenue, United Auto Workers (UAW) Local 179, Wonder/Hostess Bakery Thrift Store, Lemp Avenue, and an office building; to the east by Home Depot; to the south by an unlined stormwater drainage area and Southern Pacific Railroad tracks, beyond which are Bobrick (washroom equipment manufacturer) and Symons Bros. Co. (construction equipment manufacturer); and to the west by Kaiser Permanente.

   (d) **Topography and slope:** The subject site slopes slightly to the south toward the unlined drainage area and railroad tracks. Based upon a review of the United States Geological Survey (USGS) topographic map for the area, the subject site is located approximately 740 feet above mean sea level.

   (e) **Depth to groundwater/flow direction:** According to a representative of the Los Angeles County Department of Public Works - Hydrologic Records, depth to groundwater was measured at 217.4 feet below ground surface on June 13, 1996, at well number 3810H, located near the railroad tracks behind Home Depot. Previously prepared environmental reports associated with the subject site indicate groundwater flow in the site vicinity is transient in nature, and has been recorded to flow in northerly, easterly, southerly, and westerly directions over the last 10 years.



ENSR

FIGURE 2

SITE PLAN

Vacant Lot

11620 Sherman Way

North Hollywood, California

DRAWN: M. SCOP	DATE: 10/1/97	PROJECT NO. 5555-298-832	REV.
FILE NO. 298-832A	CHK BY:		

(f) **Surface water and wet areas (including streams, rivers, ponds, etc.):** No surface water was observed onsite. Several surface area depressions were observed to be wet at the time of ENSR's site visit, which were consistent with, and presumed to be a result of, recent rain in the area.

(g) **Ditches/drainage features:** No ditches were observed onsite. Based on the southerly slope of the site, surface water runoff is expected to be to the south toward the unlined drainage area and railroad tracks.

(h) **Floodplains:** According to a representative of the City of Los Angeles Department of Public Works - Flood Zone Determination Hotline, the subject site is not located within a 100-year floodplain.

(i) **Wetlands:** Based upon a review of the USGS topographic map for the subject site area and visual observations made during the site visit, the subject site does not appear to be located in a wetlands area. However, it should be noted that a wetlands delineation was not conducted as part of this assessment.

(j) **Radon:** Radon information provided in the Environmental Data Resources (EDR) report indicates that the average radon activity level in a first floor living area in the county of Los Angeles is 0.711 picoCuries per liter (pCi/L) for 63 sites tested. Ninety-eight percent of the sites tested had less than 4 pCi/L and two percent had between 4 and 20 pCi/L. One hundred percent of the basements tested had less than 4 pCi/L. EDR obtains radon information from the National Radon Database, which was developed by the Environmental Protection Agency (EPA). The EPA action level for radon is 4.0 pCi/L. Due to the fact that there are no residential structures on the subject site and the average radon level for the subject site vicinity is below the EPA action level, radon sampling does not appear to be warranted.

2. **Brief description of current use in terms of products made; processes used; raw materials employed; chemicals and fuels used; and wastes generated, including waste disposal facilities/locations used:**

The subject site is currently vacant and undeveloped. There are no products made, processes used, raw materials employed, chemicals and fuels used, or wastes generated onsite.

3. **Selected facility information:**

   (a) **Septic tanks/leaching fields:** No evidence of septic tanks or leach fields was observed onsite.

   (b) **Sanitary sewers:** Service for the subject site area is provided by the City of Los Angeles, Engineering Department.

   (c) **Process wastewater sewers:** No evidence of process wastewater sewers was observed onsite.

   (d) **Facility water supplies (potable and process):** Service for the subject site area is provided by the City of Los Angeles, Department of Water and Power (LADWP).

   (e) **Aboveground and underground storage tanks:** No evidence of aboveground storage tanks (ASTs) or underground storage tanks (USTs) was observed during the site visit. According to previously prepared environmental reports, reviewed as part of ENSR's Baseline Environmental Condition Assessment of the subject site (ENSR document number 5555-280-832); several USTs and ASTs were formerly located onsite. See Part III, section 1 for further discussion of former site uses.

   (f) **Electrical transformers/capacitors:** One pole-mounted electrical transformer/ capacitor was observed in the southeast corner of the subject site. No staining or other evidence of leaks was observed on the transformer, pole, or ground surface beneath the transformer. According to Jim Kloiber of the LADWP, this transformer was placed onsite in 1991 and does not contain polychlorinated biphenyls (PCBs).

   (g) **Wells (active or abandoned monitoring, potable or process water supply, injection, gas/oil):** Two monitoring wells were observed onsite – one near the northwest corner of the site and one near the south-central portion of the site. Previously prepared environmental reports associated with the subject site indicate these wells were installed in 1991. A third onsite well was identified to be located near the central-west portion of the subject site in these reports; however it was not observed during ENSR's site visit. Four soil vapor probe wells were also observed onsite – one in the northwest corner, one in the central portion, one in the southwest portion, and one in the south-central portion. The previously prepared environmental reports indicate these wells were installed in 1995. The monitoring wells and soil vapor probe wells were installed as part of numerous soil, groundwater, and soil gas investigations conducted onsite since 1984. A summary of the results of these

investigations is provided below in Part V, section 1. A more detailed summary is provided in ENSR's Baseline Environmental Condition Assessment letter report.

4. **Observations concerning waste management practices at site**

   (a) **Date of site/facility inspection:** ENSR's site visit occurred on September 26, 1997.

   (b) **Weather-related limitations:** No weather-related limitations were encountered.

   (c) **Access-related limitations:** No access-related limitations were encountered.

   (d) **General condition of interior areas:** No interior areas are located onsite.

      (i) **Process areas:** Not applicable.

      (ii) **Raw material/chemical supply areas:** Not applicable.

      (iii) **Waste storage areas:** Not applicable.

      (iv) **Floor drains, sumps:** Not applicable.

   (e) **General condition of exterior areas:**

      (i) **Process areas:** No process areas were observed.

      (ii) **Waste storage areas:** No waste storage areas were observed.

      (iii) **Loading/unloading docks:** No loading/unloading docks were observed.

      (iv) **Tank fill locations:** No tank fill locations were observed.

      (v) **Catch basins:** No catch basins were observed.

   (f) **Other observations:**

      (i) **Discolored soils:** No discolored soils were observed. However, eight 12- to 18-inch-diameter areas of what appeared to be recently poured cement were observed on the central portion of the subject site, south of the area of depression. These

areas are presumed to be associated with former soil borings installed as part of the soil and groundwater investigations previously conducted onsite.

(ii) **Discolored water:** No discolored water was observed.

(iii) **Unusual odors:** No unusual odors were detected.

(iv) **Unusual vegetative conditions:** No unusual vegetative conditions were observed.

(v) **Other:** An area of depression was observed in the central-west portion of the subject site, between one of the monitoring wells and one of the soil gas probe wells. This depression is presumed to be a result of the excavation of approximately 20 cubic yards of chromium-contaminated soil (see Part V, section 1, below, for further discussion).

PART III: SITE HISTORY AND DESCRIPTION OF SURROUNDING LAND USES

1. **Description of former uses of site, including dates (where known), and other relevant information concerning waste generation, disposal, and underground tanks:**

Historical information for the subject site is based on, a review of aerial photographs, building department records, topographic maps, and previously prepared environmental reports. Sanborn fire insurance map coverage does not exist for the subject site area.

It should be noted that research conducted at the City of Los Angeles Building Department indicates 11620 Sherman Way is the address assigned to the subject site as of February 14, 1997. The subject site (currently identified as 11620 Sherman Way) was formerly part of a larger parcel (identified as 11600 Sherman Way), which included land currently located adjacent to the east and west of the subject site (currently occupied by Home Depot and Kaiser Permanent, respectively). This larger parcel was identified in building department records as a "portion of lots 63 and 64, property of Lankershim Ranch Land and Water Co." According to historical information provided in reports reviewed as part of this assessment, land use on and around the site was agricultural up to the 1930s; two diary farms were reported to be located west of the subject site.

ENSR requested a review of building records associated with 11600 and 11620 Sherman Way. No records were found on file for 11620 Sherman Way. However, according to building department records, over 200 permits have been issued for 11600 Sherman Way. ENSR was unable to review all records on file. The records summarized below represent ENSR's attempt to review a random sampling of permits from each year where records were identified.

The oldest record on file with the building department for 11600 Sherman Way is an "Application for the Erection of a Building," dated July 23, 1941. Information provided in this permit indicates the lot size was 680 feet by 1,120 feet. The owner was identified as Bendix Aviation Ltd. "Ranch buildings" were onsite and scheduled to be demolished to make way for an approximately 269-foot by 351-foot, one- and two-story manufacturing building. Other building permits issued in 1941 include an approximately 27-foot by 33-foot "time clock house," an approximately 21-foot by 16-foot "guard house," a 46-foot by 170-foot two-story office building, and a 30-foot by 136-foot one-story "building." Previously prepared environmental reports indicate site activities and building uses included storage, offices, and manufacturing. The principal industrial operations onsite

since 1941 have been the manufacture of hydraulic and pneumatic valves by the Bendix Corporation. Various degreasing solvents have been used throughout the facility's history, and plating and other manufacturing operations were conducted.

Building permits issued in 1942 include a 22-foot by 24-foot one-story "women's toilet and locker room addition," a 20-foot by 104-foot "oil and metal storage" building, a 30-foot by 40-foot one-story "storage" building, and a "redwood cooling tower." An "Application to Alter, Repair, Move or Demolish," dated October 13, 1942, indicates four "manufacturing and office" buildings existed onsite. The purpose of the application was to "add pits in present floor for plating tanks and for heat treatment furnaces" in an existing 350-foot by 270-foot building.

Building permits issued in 1943 include a 12-foot by 18-foot storage building, a 20-foot by 60-foot "oil and paint storage building," a "covered addition for shipping," a 20-foot by 50-foot "garage," and a 16-foot by 29-foot "storage shed." Six buildings were identified as already onsite.

Building permits issued in 1951 include a 20-foot by 20-foot "addition of a three story test building."

A 1954 aerial photograph shows the subject site occupied by two approximately 1,000-square-foot buildings – one near the northeast corner and one near the northwest corner. Due to the poor quality and scale of the photograph, no other distinctive features were discernible.

Building permits issued in 1955 include an approximately 8-foot by 20-foot "equipment room and partitions" to be added to an existing 194-foot by 315-foot building. A site plan drawing included with this permit shows this building to be located adjacent to the west of the subject site and identified as "Engineering." The site plant shows the subject site occupied by an approximately 35-foot by 20-foot square-shaped building in its northwest corner, a portion of an approximately 150-foot by 40-foot rectangular-shaped building in its northeast corner (identified as "Offices Adm."), half of an approximately 350-foot by 250-foot square-shaped building on its east side (identified as "Plant No.1"), and a portion of an approximately 100-foot by 30-foot rectangular-shaped building in its southeast corner (identified as "Maint.").

A 1960 aerial photograph shows the north end of the subject site occupied by three square-shaped buildings across the northern boundary, and a fourth square-shaped building located near the northeast corner. Approximately half of a large square-shaped

building is located on the east side of the subject site (the remaining half is located on land adjacent to the east of the subject site). The south portion of the site is occupied by approximately half of a rectangular-shaped building located along the south boundary, a rectangular-shaped building near the southwest corner, and several other small square-shaped building and vehicles. The west side of the site appears to be paved driveway and parking area.

Building permits issued in 1962 include a 12-foot by 18-foot "hoist tower over existing foundation." The present use of the structure is identified as "test rig for missile," and the new use is identified as "erector." The number of existing buildings is identified as three factories and offices.

The 1966 United States Geological Survey (USGS) topographic quadrangle map of the subject site area shows the subject site occupied by a small square-shaped building in its northwest corner, a portion of a rectangular-shaped building located near the northeast corner, approximately half of a large square-shaped building located on the east side of the site, and approximately half of a rectangular-shaped building located along the southern boundary.

Building permits issued in 1967 include 30-foot by 72-foot one-story "testing building." A site plan drawing included with this permit indicates the building was to be constructed in the south portion of adjacent property to the west of the subject site.

Building permits issued in 1968 include 60-foot by 100-foot building for the "manufacturing of valves." This permit indicates there were 10 manufacturing buildings onsite at that time.

A 1968 aerial photograph shows the subject site generally as it appeared in the 1960 aerial photographs.

A 1972 photorevision of the 1966 USGS map shows the subject site generally as it appeared on the 1966 map.

A 1976 aerial photograph shows the subject site generally as it appeared in the 1960 and 1968 aerial photographs.

Previously prepared environmental reports indicate the Bendix Corporation was purchased by Allied-Signal in 1982-83, and operations were conducted at the facility through February 1992.

According to a site plan dated April 14, 1993, and reviewed as part of ENSR's Baseline Environmental Condition Assessment, the following areas/uses were identified at the subject site :

North Portion

- Personnel and administration office buildings

Central Portion

- Four USTs located outside the northwest corner of the former Plant 1 building
- Solvent degreaser and deep hole boring machine sump located inside the northwest corner of the former Plant 1 building
- Six aboveground storage tanks (ASTs) (cyanide destruction, chromium reduction and associated chemicals); three aboveground wastewater clariflers; a solvent storage area; and one trichloroethane (TCA) AST located outside the central-west wall of the former Plant 1 building
- A machine shop, plating area, two sumps, and a vapor degreaser located inside the central-west wall of the former Plant 1 building
- A heat treatment area, oil quench pit, and vapor degreaser located inside the southwest corner of the former Plant 1 building
- A clarifier located outside the southwest corner of the former Plant 1 building

South Portion

- A building identified as containing an acid room, chemical/waste storage area, and raw stock oil house reclaiming located near the southwest corner
- A sump, coolant AST, incinerator, drum storage area, and AST chemical/waste storage area located in the southwest corner
- A transformer, maintenance shop, sump and paint shop located in the southeast corner

Building records from 1993 indicate nine permits for "demolition, clear the lot, dozerwreck" were issued for the demolition of the following buildings:

- 46-foot by 170-foot "offices adm." building located near northeast corner of subject site
- 60-foot by 30-foot building located in northwest corner of subject site
- 265-foot by 435-foot "Plant 1" building located on east side, and adjacent to the east, of subject site
- 240-foot by 35-foot "Plant 2" building located to the east of "Plant 1" building
- 35-foot by 400-foot building located near the southeast corner of subject site
- 15-foot by 110-foot building located near the southeast corner of subject site, and adjacent to the south of the 35-foot by 400-foot building
- 30-foot by 60-foot building located in south portion of subject site
- 20-foot by 30-foot building located near the southeast corner of "Plant 1" building, east of the subject site
- 20-foot by 70-foot building located east of the subject site

Building records from 1994 indicate a grading permit was issued for the "treatment of contaminated soil." The owner was identified as Allied Signal, Inc. Aerospace Systems and Equipment.

2. **Description of current and former uses of properties abutting or adjacent to site, including relevant information concerning potential waste generation and underground tanks:**

The subject site is currently bordered to the north by Sherman Way, beyond which are Irvine Avenue, United Auto Workers (UAW) Local 179, Wonder/Hostess Bakery Thrift Store, Lemp Avenue, and an office building; to the east by Home Depot; to the south by an unlined stormwater drainage area and Southern Pacific Railroad tracks, beyond which are Bobrick (washroom equipment manufacturer) and Symons Bros. Co. (construction equipment manufacturer); and to the west by Kaiser Permanente.

Historical information for land located adjacent to the subject site is based on a review of aerial photographs and topographic maps. Sanborn fire insurance map coverage does not exist for the subject site area. It should be noted that adjacent land to the east and west of the subject site was previously associated with the Allied Signal/Bendix facility, of which the subject site was a part.

A 1954 aerial photograph shows adjacent land to the north occupied by Sherman Way, beyond which appears to be a vacant, undeveloped lot. Land to the east appears to be occupied by a rectangular-shaped building near its southwest boundary, and a square-shaped building and trees near its north boundary. Railroad tracks and vacant land are located adjacent to the south, and a rectangular-shaped building and vehicles are located to the west. No other distinctive features were discernible, due to the poor quality and scale of the photograph.

A 1955 site plan drawing reviewed at the building department shows a 194-foot by 315-foot building located adjacent to the west of the subject site and identified as "Engineering." A "garage," "storage" building, and parking area are also located adjacent to the west of the subject site. The site plan shows adjacent land to the east of the subject site occupied by a portion of an approximately 150-foot by 40-foot rectangular-shaped building (identified as "Offices Adm.") in its northwest corner, half of an approximately 350-foot by 250-foot square-shaped building on its west side (identified as "Plant No.1"), and a portion of an approximately 100-foot by 30-foot rectangular-shaped building in its southwest corner. A "gate house," "guard house," "test" building, two "storage" buildings, "clock house," "power house," "offices/cafe," and "maintenance" building are also located on adjacent land to the east of the subject site. Southern Pacific Railroad tracks are shown to the south and Sherman Way is shown to the north.

A 1960 aerial photograph shows adjacent land to the north occupied by Sherman Way, beyond which are approximately 30 parked vehicles. Adjacent land to the east is occupied by a square-shaped building and trees in its north portion, approximately half of a large square-shaped building near its center, and approximately half of a rectangular-shaped building along its south boundary. Several small square-shaped buildings, and vehicles are located on the remaining portions of the property located adjacent to the east of the subject site. Adjacent land to the south is occupied by railroad tracks, a vacant lot, and what appears to be a lumber yard. Adjacent land to the west is occupied by a large rectangular-shaped building and associated parking lot.

The 1966 USGS shows adjacent land to the north occupied by Sherman Way, beyond which are Irvine Avenue, a small irregular-shaped building presumed to be the building currently occupied by the UAW Local 179, a vacant lot, and Lemp Avenue. Adjacent land to the east is occupied by a portion of a rectangular-shaped building in its north portion, approximately half of a large square-shaped building on its west side, and approximately half of a rectangular shaped building along its southern boundary. Two other small square-shaped buildings are located adjacent to the north and east of this rectangular-shaped building. Adjacent land to the south is occupied by railroad tracks,

beyond which are vacant and developed land. The developed portion is identified by a red tint, indicating a developed area in which only landmark buildings are shown. Adjacent land to the west is occupied by one large rectangular-shaped building with two smaller rectangular-shaped buildings located near its southeast corner.

A 1967 site plan drawing shows adjacent land to the east and west of the subject site occupied by those buildings identified in the 1955 site plan plus several other small buildings. None of the buildings is identified by use in the 1967 site plan.

A 1968 aerial photograph shows adjacent land to the north occupied by Sherman Way, beyond which appears to be the building currently occupied by UAW Local 179, a parking lot, Lemp Avenue, and another parking lot. Adjacent land to the east and west appears generally as it did in the 1960 aerial photograph. Adjacent land to the south is occupied by railroad tracks and what appears to be an unpaved lot and parked vehicles. Other specific features were difficult to ascertain due to the poor quality of the photograph.

A 1972 photorevision of the 1966 USGS map shows adjacent land to the north as it appeared on the 1966 map. Adjacent land to the east is generally as it appeared on the 1966 map, with the addition of one rectangular-shaped building between the large square-shaped building and the rectangular-shaped building along the south boundary. Adjacent land to the south appears generally as it did on the 1966 map. Adjacent land to the west is occupied by one large-rectangular-shaped building; the two smaller buildings observed on the 1966 map are no longer present.

A 1976 aerial photograph shows adjacent land to the north occupied by Sherman Way, beyond which appear to be the buildings associated with the UAW Local 179 and Bakery Thrift Store, Lemp Avenue, and a parking lot. Adjacent land to the east, south, and west appears generally as it did in the 1960 aerial photograph.

Building records from 1995 indicate Home Depot, located adjacent to the east of the subject site, was issued a permit for "site preparation for retail building" at 11600 Sherman Way.

3. **Description of other potentially significant land uses currently situated within a minimum of 250 feet of site:**

No other potentially significant land uses were identified within 250 feet of the subject site.

PART IV: INVENTORY OF SENSITIVE RECEPTORS IN SITE VICINITY

1. **Wells/potable drinking water supplies within 1,000 feet:**

   According to Albert (no last name provided) of the LADWP, no drinking water wells are located within 1,000 feet of the subject site.

2. **Residences within 1,000 feet:**

   A residential neighborhood is located within 1,000 feet north of the subject site.

3. **Significant wet areas/surface water bodies within 1,000 feet:**

   No significant wet areas/surface water bodies were identified within 1,000 feet of the subject site.

4. **Other sensitive, offsite receptors within 1,000 feet:**

   No other sensitive, offsite receptors were identified within 1,000 feet of the subject site.

PART V: DESCRIPTION OF KNOWN OR SUSPECTED RELEASES OF HAZARDOUS MATERIALS OR PETROLEUM HYDROCARBONS

As part of ENSR's investigation of the subject property, a review of various governmental databases was conducted through EDR of Southport, Connecticut.

The following federal and state contamination-related databases were searched for the areas surrounding the subject property; the various search distances used are noted in parenthesis:

- Cal-Sites: For known and potential hazardous waste sites in the state of California (1.0 mile)
- CERCLIS: For abandoned, uncontrolled or inactive hazardous waste sites reported to the U.S. EPA (0.5 mile)
- CHMIRS: For reported hazardous material incidents reported to the California Office of Emergency Services (accidental releases or spills) (1.0 mile)
- CORRACTS: For sites identified as hazardous waste handlers with RCRA corrective action activity (1.0 mile)
- Cortese: For identified hazardous waste and substance sites in the state of California (1.0 mile)
- NPL: For existing and proposed Superfund sites on the National Priorities List (1.0 mile)
- Notify 65: For notifications about any release in California which could impact drinking water and thereby expose the public to a potential health risks (1.0 mile)
- RCRIS/TSDF: For reported sites that treat, store and/or dispose of hazardous waste and subject to the federal RCRA regulations (1.0 mile)

- Toxic Pits: For sites in the state of California suspected of containing hazardous substances where cleanup has not yet been completed (1.0 mile)
- LUST: For leaking underground storage tanks (UST) reported to the state under various state regulations (0.5 mile)
- SWF/LF (SWIS): For identified landfill sites designated under various state regulations (0.5 mile)
- UST: For USTs registered on under various state regulations (0.5 mile)
- RCRIS/LQG: For reported large-quantity generators of hazardous waste (0.25 mile)
- RCRIS/SQG: For reported small-quantity generators of hazardous waste (0.25 mile)
- ERNS: For sites reporting spills to the U.S. EPA and/or the U.S. Coast Guard under various federal regulations (0.1 mile)
- HMIRS: For sites reporting hazardous material spill incidents to the U.S. Department of Transportation under various federal regulations (0.1 mile)
- FINDS: For site information and "pointers" to other sources that contain more detail (target property)
- PADS: For generators, transporters, commercial storers and/or brokers and disposers of PCBs who are required to notify the EPA of such activities (target property)
- RAATS: For enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA (target property)
- WMUDS: For program tracking and inventory of waste management units in the state of California (target property)

- TRIS: For facilities releasing toxic chemicals to the air, water, and land in reportable quantities under SARA Title III, Section 313(target property)

- TSCA: For manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list (target property)

The radial search distances used equal or exceed those proposed by the ASTM (formerly American Society for Testing and Materials) for assessing the environmental condition of commercial real estate.

The results of the database search were used to respond to the issues discussed in this part of the questionnaire.

1. Has the subject site ever been listed on any of the following:

	Yes	No
(a) National Priorities List (Superfund)	✓	
(b) CERCLIS Database (of Potential Problem Sites)		✓
(c) State List/Inventory of Problem Sites	✓	

The Allied Signal/Bendix site is located within the North Hollywood Operable Unit of the North Hollywood Well Field (San Fernando Valley Groundwater Basin) designated by the U.S. Environmental Protection Agency (EPA) on the National Priorities List (NPL). Allied Signal was named by the EPA as a potentially responsible party (PRP), in addition to 12 other parties. The Allied Signal site was investigated under the Well Investigation Program (WIP) conducted by the RWQCB with regard to its potential to have contributed to the contamination associated with the NPL site. According to a Second Partial Consent Decree, a settlement was reached between the United States of American and the State of California, plaintiffs, and Allied-Signal, Inc., et al., defendants, with regard to the NPL site. This decree specifically states that "...any change in ownership or corporate or other legal status, including but not limited to any transfer of assets or real or personal property, shall in no way alter the status or responsibilities of the Settling Defendants under this Consent Decree." It also states that "...the Plaintiffs covenant not to sue or to take administrative

action against Settling Defendants...with regard to all NHOU [North Hollywood Operable Unit] ROD [Record of Decision" Response Costs and all past Basin Wide Response Costs." The Consent Decree was signed by Allied Signal, Inc., on October 2, 1996. See section 3 below for further discussion of the NPL site.

The subject site was identified (as part of the former Allied Signal/Bendix site) on the Cortese database of identified hazardous waste and substance sites, on the Resource Conservation and Recovery Information System (RCRIS) database as a large-quantity generator of hazardous waste, and on the Los Angeles County Site Mitigation Complaint Control Log of industrial sites that have had a spill or complaint. It was also identified as a leaking underground storage tank (LUST) site.

Information provided in the EDR report indicates 13 USTs, ranging in size from 150 gallons to 3,000 gallons were previously located at the Allied Signal/Bendix facility, and that they were installed between 1941 and 1981. Leak detection methods were identified as "stock inventory," "visual," and "GW monitoring well." RCRIS information provided in the EDR report identifies the site owner as The Bendix Corporation and indicates no violations were found. LUST/Cortese information provided in the EDR report indicates a release of solvents was reported on October 15, 1984; soil was the only media impacted; pollution characterization was completed on July 14, 1988; a remediation plan was developed; and contaminated soil was excavated and disposed at an approved site. No other pertinent information was provided in the EDR report.

ENSR reviewed numerous reports, dated from May 1984 through August 1997, regarding soil and groundwater investigative activities conducted at the former Allied Signal/Bendix facility. Individual summaries of each report reviewed are presented in ENSR's Baseline Environmental Condition Assessment letter report. A discussion of the findings is provided below.

Soil and groundwater contamination has been identified throughout the subject site. Contaminants of concern were identified as total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), and chromium (total and hexavalent).

TPH-impacted soil was identified at numerous locations onsite, which was excavated and treated. A practical action level (PAL) of 1,000 parts per million (ppm) and cleanup level of 100 ppm were approved by the RWQCB. PALs are concentration levels of hydrocarbons in the soil below which the impacted soil may be left in place at a site. Confirmation sampling in onsite impacted areas indicated soil with TPH concentrations above the PAL had been removed and remediated to the cleanup level established. Based on the RWQCB-approved

PALS and cleanup levels, TPH-impacted soil with concentrations up to 100 ppm may remain onsite in those areas identified in the northwest, central-west, central, and central-east portions of the subject site, where TPH-impacted soils were identified. According to a letter from the RWQCB to Allied Signal, Inc., dated March 8, 1995, no further action was required by the RWQCB with respect to TPH-impacted shallow soils, which the RWQCB determined had been remediated to acceptable levels.

VOC-impacted soil was detected in "very low to negligible" concentrations in shallow soil confirmation samples with the highest TPH concentrations, indicating that shallow soil containing VOCs in the areas of reported TPH-impacted soil were properly removed and remediated. All soil samples analyzed for VOC concentrations, as part of the TPH-impacted soil cleanup efforts, were found to contain less than 11 parts per billion (ppb). However, the most recent soil gas monitoring (May 1996) results indicate trichloroethylene (TCE) concentrations in deep onsite soil ranging from a low of 14.0 ppb at 100 feet below ground surface (bgs) to a high of 515 ppb at 200 feet bgs. The higher concentrations at greater depths are speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone.

The most recent groundwater monitoring results (third and fourth quarters 1995) indicate TCE, dichloroethene (DCE), and carbon tetrachloride (CCl_4) were detected at concentrations above their respective maximum contaminant levels (MCLs) (5.0, 6.0, and 0.5 ppb). Over the course of groundwater monitoring events conducted at the subject site, concentrations of these contaminants have ranged from 3.6 to 6,400 ppb, 0.31 to 17 ppb, and 0.32 to 5.0 ppb, respectively. The December 1995 sampling detected TCE, DCE, and CCl_4 concentrations ranging from 25 to 160 ppb, 0.98 to 4.9, and 0.32 to 5.0 ppb, respectively. VOC concentrations in groundwater appear to vary based on the fluctuating groundwater levels and transient nature of groundwater flow beneath the subject site.

Total chromium and chromium VI concentrations up to 1.4 ppm were detected in groundwater samples taken from the central-west portion of the subject site as recently as July 1997, and soil concentrations were reported up to 2,280 ppm for total chromium and 37.5 ppm for chromium VI. The MCL for total chromium in drinking water is 50 ppb. Preliminary remediation goals (PRGs) for total chromium and chromium VI are 450 ppm and 64 ppm, respectively. Chromium VI concentrations exceeding the soluble threshold limit concentration (STLC - California hazardous waste criteria) of 5 ppm were detected in soil at a depth of 45 feet bgs in the central-west portion of the subject site. Approximately 20 cubic yards of chromium-impacted soil was reported (in an RWQCB closure letter dated August 12, 1997) to have been removed from the subject site; however, this removal is not

expected to have addressed the levels of chromium detected up to 45 feet bgs. Significant levels of chromium appear to remain in the central-west portion of the subject site.

According to a *Closure for Allied Signal Western Parcel* letter from the RWQCB to Allied Signal, Inc., dated August 12, 1997, no further soil assessment and remediation activities are required with respect to the Well Investigation Program (WIP) for the subject site. However, the RWQCB did state that, since groundwater samples had detected concentrations of total chromium and chromium VI, at least two additional downgradient groundwater samples must be collected to generate sufficient data to determine onsite groundwater conditions. The RWQCB recommended that these samples be collected in February and July 1998. This letter further stated that, although the subject site was exempt from further assessment and remediation requirements with regard to the WIP, requirements of other agencies, such as the U.S. EPA, are not affected by the RWQCB's no further requirements determination, and such agencies may choose to make their own determination concerning the subject site.

2. **If the facility or site has <u>not</u> been listed in (1) above, has the facility ever had a release, spill, or leak of a hazardous substance or petroleum hydrocarbons or has the facility/site ever been investigated by a governmental agency for the actual or potential presence of an onsite contamination problem? If so, describe the circumstances surrounding the incident (date, source, location), including any notification submitted or received, the agency response, and current status of the matter:**

   See item 1 above.

3. **Are any sites located within a minimum of 1,000 feet of the subject site shown on either the National Priorities List of federally designated/proposed Superfund sites, the U.S. EPA's CERCLIS database list of potential problem sites, or any comparable state list; for each identified site, describe source of listing, approximate distance and direction relative to subject site, and whether or not the listed site appears to be in an upgradient, downgradient, or parallel hydrogeological gradient relative to the subject property:**

   One NPL site was identified within 1 mile of the subject site, as follows:

   - **San Fernando Valley Groundwater Basin (SFVGWB)** is a regional groundwater contamination area located beneath the subject site and other communities located in the San Fernando Valley. This site was also identified on the Comprehensive

Environmental Response, Compensation and Liability Information System (CERCLIS), and Cal-Sites databases.

Information provided in the EDR report indicates a discovery assessment was completed on December 1, 1983; a hazard ranking, screening site inspection, and preliminary assessment were completed on April 1, 1984; final listing on the NPL was completed on June 10, 1986; and a removal investigation was completed on June 17, 1991; and the site is currently under investigation by the government to assess the extent of further action. Groundwater in the area, which is used for drinking water, is reported to be contaminated with chlorinated organics and solvents, such as perchloroethene (PCE), TCE, and chloroform. Groundwater contamination is linked to pre-war, post-war, and current industrialization in the San Fernando Valley, as a result of improper use, storage, and disposal practices. Federal, state, and local agencies have been conducting investigations and cleanup of contaminated groundwater in the SFVGWB since contamination was discovered in 1979. The RWQCB is conducting an investigation into the area-wide sources of groundwater contamination in the SFVGWB, which is overseen by the U.S. Environmental Protection Agency (EPA). Further information provided in the EDR indicates the EPA and the RWQCB are identifying potential sources of contamination and pursuing potentially responsible parties (PRPs) that may be responsible for contaminating groundwater. Enforcement agreements and orders have been implemented at numerous specific potential source sites within the SFVGWB. According to a *PCE Contamination in Shallow Zone in Fall 1993* map of the SFVGWB, PCE concentrations ranged from nondetectable to 5 parts per billion (ppb) in the vicinity of the subject site. A *TCE Contamination in Shallow Zone in Fall 1993* map of the SFVGWB indicates TCE concentrations range from nondetectable to 50 ppb in the vicinity of the subject site. Five ppb is the MCL established for PCE and TCE in drinking water.

No other NPL sites were identified within 1 mile of the subject site, nor were any other CERCLIS sites identified within ½ mile of the subject site. The following state hazardous waste sites (SHWS) were identified within 1 mile of the subject site:

- **Pacific Airmotive**, located at 6909 Lankershim Boulevard, between ¼ and ½ mile south-southwest of the subject site, was identified on the Cal-Sites database. Information provided in the EDR report indicates that, as of April 1984, the site was "referred to another agency." A RCRA preliminary assessment determined "no further action." Based on its status and distance from the subject site, this site is not expected to have impacted the subject site.

- **Pacific Airmotive**, located at 6853 Lankershim Boulevard, between ¼ and ½ mile south-southwest of the subject site, was identified on the Cal-Sites and CERC-NFRAP (no further remedial action planned) databases. CERC-NFRAP information provided int he EDR report indicates a discovery assessment was completed on June 1, 1981, and a preliminary assessment was completed on September 1, 1984; and a RCRA preliminary assessment determined "no further action." Based on its status and distance from the subject site, this site is not expected to have impacted the subject site.

- **Nickel Solution Recycling, Inc.**, located at 11940 Sherman Way, between ¼ and ½ mile west of the subject site, was identified on the Cal-Sites database. Information provided in the EDR report indicates that, as of August 31, 1995, discovery and site screening assessments were conducted and that, according to an EPA report dated June 20, 1990, all hazardous waste contamination was removed the emergency response team and the site was recommended for no further action. Based on its status and distance from the subject site, this site is not expected to have impacted the subject site.

No other offsite sources of concern were identified within 1,000 feet of the subject site.

In addition to the above sources, 10 UST sites were identified within ¼ of the subject site, one of which – Kaiser Permanent – is located adjacent to the west of the subject site. None of the UST sites was identified on a contamination-related database and they are, therefore, not expected to have impacted the subject site. No LUST sites were identified within ¼ mile of the subject site; however, three were identified approximately ½ mile of the subject site. Based on their distance from the subject site, these three sites are not expected to have impacted the subject site. Six RCRIS sites were identified within ¼ mile of the subject site, one of which – Kaiser Permanente – is located adjacent to the west of the subject site. None of the RCRIS sites was identified on a contamination-related database and they are, therefore, not expected to have impacted the subject site. No other offsite sources of potential concern were identified within 1,000 feet of the subject site. It should be noted that the portion of the former Allied Signal facility currently occupied by Kaiser Permanente has not been closed by the RWQCB with regard to contamination associated with activities previously conducted by Allied Signal at the Kaiser Permanente property.

PART VI: REFERENCES

1. **Persons performing the site investigation (name, title, responsibility):**

   Brenda Miller, Environmental Analyst
   Site visit, research, and report generation

2. **Persons interviewed (name, title, address, phone number):**

   Representative
   Los Angeles County Department of Public Works
   Hydrologic Records
   (818) 458-6120

   Representative
   City of Los Angeles Department of Public Works
   Flood Zone Determination Hotline
   (213) 847-5220

   Jim Kloiber
   City of Los Angeles Department of Water and Power
   Electrical Inspection Division
   (818) 771-4057

   Albert (no last name provided)
   City of Los Angeles Department of Water and Power
   (213) 367-4211

3. **Reports and documents reviewed:**[1]

Aerial photographs dated 1954, 1960, 1968, and 1974. Provided by EDR, 3530 Post Road, Southport, Connecticut, (800) 352-0050.

[1] We have examined and relied upon the reports and documents listed above, which are based on the professional expertise or knowledge of the authors thereof. We have not conducted an independent examination of facts contained in these reference materials and have assumed that the information set forth therein is true and accurate.

Baseline Environmental Condition Assessment letter report. Prepared by ENSR, document number 5555-280-832.

Building department records. Reviewed at the City of Los Angeles Department of Building and Safety, Records Department, Fourth Floor, Counter E, 200 N. Spring Street, Los Angeles, California, (213) 485-7094.

Environmental Data Resources (EDR), *Radius Map with Geocheck*, report for Allied Signal/Bendix, 11600 Sherman Way, Los Angeles, California, dated September 19, 1997. EDR inquiry number 0199304.3r.

Sanborn fire insurance maps. Inquiry made through EDR Sanborn, Inc., 3530 Post Road, Southport, Connecticut, (800) 352-0050.

United States Geological Survey 7.5-minute topographic quadrangle map, Van Nuys, California 1966, and 1966 photorevised 1972.

QUALITY CONTROL REVIEW

NAME: Brenda Miller

TITLE: Environmental Analyst

DATE: October 9, 1997

QUALITY CONTROL REVIEW BY:

NAME: Jacqueline Breese

TITLE: Manager, Environmental Management

DATE: October 10, 1997

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December 22, 1997

Mr. Hugh Horne
Public Storage, Inc.
701 Western Avenue, Suite 200
P.O. Box 25050
Glendale, California 91221-5050

Re: **5555-280-832**

Subject: **Baseline Environmental Condition Assessment of a Vacant Lot Located at 11620 Sherman Way, North Hollywood, California**
Public Storage Property No. 99832

Dear Mr. Horne:

ENSR is pleased to transmit this report on the above-referenced property. This assessment was performed pursuant to ENSR's written proposal dated September 24, 1997. The agreed-upon objective of the assessment was to review documentation prepared for Allied Signal and provided to ENSR by Public Storage, and to provide a report describing the current environmental condition of the site. Sampling was not conducted as part of this baseline environmental condition assessment.

The following paragraphs describe the site, provide a brief history of the site, summarize the documents reviewed, provide our findings regarding the types and levels of contaminants present in the onsite soil and groundwater, and delineate the areas of potential concern.

Site Description

The subject site is a rectangular-shaped parcel consisting of approximately 3.5 acres of vacant land located on the south side of Sherman Way, between Lankershim Boulevard to the west and Tujunga Avenue to the east, in North Hollywood, Los Angeles County, California.

Site History

According to information provided in ENSR document number 5555-298-832, *Phase I Environmental Due Diligence Examination of a Vacant Lot Located at 11620 Sherman Way, North Hollywood, California*, dated October 3, 1997, the subject site (currently identified as 11620 Sherman Way) was formerly part of a larger parcel (identified as 11600 Sherman Way), which included land currently located adjacent to the east and west of the subject site (currently occupied by Home Depot and Kaiser Permanent, respectively). This larger parcel

was identified in building department records as a "portion of lots 63 and 64, property of Lankershim Ranch Land and Water Co." According to historical information provided in reports reviewed as part of this assessment, land use on and around the site was agricultural up to the 1930s; two dairy farms were reported to be located west of the subject site. The subject site owner was identified as Bendix Aviation Ltd. in building department records from 1941, which is the first year records were found for the subject site property. "Ranch buildings" were identified onsite in a 1941 "Application for the Erection of a Building," dated July 23, 1941. Information provided in this permit indicates the lot size was 680 feet by 1,120 feet. The ranch buildings were demolished to make way for a manufacturing facility that, at one time, included approximately 10 buildings. Site activities and building uses included storage, offices, and manufacturing. The principal industrial operations onsite since 1941 have been the manufacture of hydraulic and pneumatic valves by the Bendix Corporation, which was acquired by Allied-Signal in 1982-83. Various degreasing solvents have been used throughout the facility's history, and plating and other manufacturing operations were conducted through February 1992. All existing buildings (except the one currently occupied by Kaiser Permanente) were demolished and the site cleared in 1993 and the subject site has been vacant since that time.

Summary of Documents Reviewed

The following paragraphs present a chronological summary of all environmental reports provided to ENSR by Public Storage, with the exception of health and safety plans and quality assurance plans, as those documents were not expected to provided pertinent information with regard to the environmental condition of the subject site. Please note that references to the "subject site" do not include adjacent land to the east and west, which were part of the former Allied Signal/Bendix site; however, all other references to the "site" are inclusive of these areas.

- ***Phase I - Preliminary Assessment of Hydrogeological Conditions Related to a Leak Detection Program*** letter report, from Leighton and Associates to Bendix Corporation, dated May 29, 1984

  Said assessment was conducted as a "first-step response" to a request from the Regional Water Quality Control Board (RWQCB). Thirteen underground storage tanks (USTs) were identified onsite. Groundwater flow was reported to be toward the southeast, and the groundwater quality beneath the site was identified as unknown at that time. This report concluded that there was no present knowledge of contamination of the groundwater supply from the site, and that the site was classified in Case I of the Leak Detection Program Guidelines of the RWQCB. The

recommended Leak Detection Program included the drilling of three borings on the southern portion of the site, and associated soil and water samples to be tested for contamination. If perched water conditions were encountered, nine additional borings would be drilled, and the borings fitted with monitoring wells.

- ***Phase II - Data Acquisition/Leak Detection Program***, letter report from Leighton and Associates to Bendix Corporation, dated October 15, 1984

  According to this report three borings were drilled onsite. Free water was not encountered in the borings, which ranged in depth from 42 to 60 feet below ground surface (bgs). Odorous and discolored soils were encountered from 5 to 55 feet in respective borings. The water table was estimated to be 233 feet bgs in the site area. The soil samples were analyzed for "composite total hydrocarbons, VOAs (GC-MS), depth-specific Total Extractable Hydrocarbons, and depth-specific Total Hydrocarbon Leachate." Total extractable hydrocarbons were detected at a concentration of 8,990 parts per million (ppm) at 50 feet bgs in one of the borings. Recommendations were made for additional testing and periodic monitoring of installed observation wells.

- ***Soil Sampling and Analysis for Identification of Contamination Plume in the Vicinity of Tank 13***, letter report from Leighton and Associates to Bendix Corporation, dated June 23, 1986

  According to this report, site contamination associated with non-halogenated volatile organics and volatile halogenated organics appeared to have occurred from different sources and/or during separate episodes, and a plume of contamination in the central-west area of the subject site had not been completely defined. Non-halogenated organics were detected at concentrations ranging from 6,000 ppm at 5 feet bgs and 11,000 ppm at 15 feet bgs. Halogenated organics were detected at concentrations ranging from 610 parts per billion (ppb) at 5 feet bgs to 13,590 ppb at 15 feet bgs in the vicinity of Tank 13 (southwest portion of the subject site). Recommendations were made for additional borings to delineate the contaminant plume.

- ***Work Plan and Time Table for the Installation of Ground Water Monitoring Wells for Identification of Contamination Plume in the Vicinity of Tank 13*** letter report, from Leighton and Associates to Bendix Corporation, dated November 18, 1986

Said monitoring well installation was to be conducted to determine whether the contamination plume in the vicinity of Tank 13 (southwest portion of the subject site) had reached the upper groundwater aquifer, which was identified approximately 200 feet bgs.

- ***Installation of Ground Water Monitoring Well for Identification of Contamination Plume in the Vicinity of Tank 13*** letter report, from Leighton and Associates to Bendix Corporation, dated July 24, 1987

  According to this report, the maximum depth of soil contamination found onsite was determined to be 60 feet bgs, which was reported to be approximately 160 feet above the water table, and groundwater flow direction was determined to be toward the south. The ratios of trichloroethane/trichloroethylene (TCA/TCE) and perchloroethylene/ trichloroethylene (PCE/TCE) in soil were found to differ significantly with depth and location, indicating separate release episodes of contaminants of different waste product mixtures. The ratio of PCE/TCE detected in the onsite soil did not correlate with the ratios of PCE/TCE detected in the groundwater at wells located downgradient, indicating the source of the groundwater contamination was different than the source of the soil contamination. Recommendations made were for submittal of said report to the RWQCB for review and re-evaluation of the proposed work plan, preparation of a work plan for mitigation of contaminated soils and soil cleanup, and abandonment of a groundwater monitoring well.

- Letters from Leighton and Associates to Bendix Corporation, dated February 25, 1988, March 18, 1988, and May 16, 1988

  According to these letters, soil removal to a maximum depth of 65 feet was to be performed in the vicinity of Tank 13 (southwest portion of the subject site). A January 28, 1995 report (summarized below) indicates soil removal was conducted in September 1994.

- ***Work Plan, Soil and Groundwater Site Characterization*** report, prepared by T.A. Gleason Associates (TAGA) for Allied-Signal Aerospace Company (ASAC), and dated November 14, 1990

  According to this work plan, "potential release sites" were identified near the northwest corner (former gasoline tank removal area/solvent storage area), central-west portion (former wastewater clarifier/plating/heat treat area), southwest

corner (former Tank 13/chemical and waste storage area), and southeast corner (former paint shop/maintenance area and power transformer) of the subject site. Other potential release sites were identified east of the subject site (where Home Depot is currently located). The objective of the proposed investigation was to evaluate the facility's relationship to the underlying groundwater and assess the extent of soil contamination.

The following processes were identified to have been conducted on, or in the vicinity of, the subject site: metal fabrication/finishing, plating, metal cleaning, vapor degreasing, heat treating, painting and stripping, hydraulic unit testing, chemical storage and handling, chemical waste storage, and plating waste treatment. The report concluded that, considering the age of the facility, it was possible that significant spills or leaks to the ground surface had occurred in the above-identified, and/or other, locations. Installation of six groundwater monitoring wells was proposed to determine hydrogeology and contaminant distribution. A soils investigation was proposed to be conducted in conjunction with installation of the groundwater monitoring wells, and was to focus on organic solvents and fuels capable of migrating substantial vertical distances in the soil, to assess the effect of soil contamination on groundwater quality.

- ***Work Plan, Phase I Site Characterization*** report, prepared by TAGA for ASAC, and dated April 24, 1991

  The primary objective of this initial phase was reported to be to evaluate the groundwater regime underlying the site, and was to include the installation of monitoring wells followed by groundwater sampling and analysis.

- ***3rd Quarter Groundwater Monitor Report***, prepared by TAGA for ASAC, and dated October 30, 1991

  This report provides information regarding the first sampling round of six groundwater monitoring wells installed at the site, and was reported to be in accordance with amendments specified in a letter dated June 25, 1991 (which was not included in the documents provided to ENSR). Results of the groundwater monitoring identified volatile organic compounds (VOCs) in five of the six wells installed at the site. The following concentrations were detected in monitoring wells located on the subject site:

- GW-2-301, near northwest corner of the subject site - TCE at 50 ppb, PCE at 1.0 ppb, DCE at 7.0 ppb, TCA at 6.7 ppb, nitrate at 13.9 ppm, and carbon tetrachloride (CCl_4) at 1.7 ppb in August 1991; and TCE at 42 ppb, PCE at 1.0 ppb, DCE at 5.3 ppb, TCA at 5.4 ppb, nitrate at 14.5 ppm, and CCl_4 at 1.9 ppb in September 1991

- GW-3-305, near central-west portion of the subject site - TCE at 110 ppb, DCE at 10 ppb, TCA at 7.3 ppb, and nitrate at 16 ppm in August 1991; and TCE at 100 ppb, PCE at 2.7 ppb, DCE at 8.5 ppb, TCA at 7.9 ppb, nitrate at 16.3 ppm, and CCl_4 at 2.0 ppb in September 1991

- GW-1-305, near southeast corner of the subject site - TCE at 40 ppb, PCE at 1.2 ppb, DCE at 3.7 ppb, TCA at 2.4 ppb, nitrate at 18 ppm, and CCl_4 at 1.1 ppb in August 1991; and TCE at 27 ppb, PCE at 1.1 ppb, DCE at 2.6 ppb, TCA at 1.6 ppb, nitrate at 17.7 ppm, and CCl_4 at 1.3 ppb in September 1991

Three VOCs (TCE, DCE, and CCl_4) were detected at concentrations exceeding the federal and California maximum contaminant levels (MCLs), which are 5.0, 6.0, and 0.5 ppb, respectively. The nitrate concentrations exceeded the MCL of 10 ppb in all monitoring wells. Nitrites were not detected in any of the monitoring wells. Sulfate and chloride concentrations were detected "well within" the secondary maximum contaminant levels (SMCLs), as were the pH values. Total dissolved solids (TDS) in most wells were slightly greater than the 500 ppm SMCL for drinking water.

- ***Fourth Quarter 1991 Groundwater Monitoring*** report, prepared by TAGA for ASAC, and dated January 31, 1992.

  This report summarized the results of the fourth quarter sampling of six groundwater monitoring wells at the site. Groundwater flow was determined to be toward the southeast. The following concentrations were detected in monitoring wells located on the subject site:

  - GW-2-301, near northwest corner of the subject site - TCA at 1.6 ppb, nitrate at 10.9 ppm, and nitrite at 3.5 ppm in January 1992

  - GW-3-305, near central west portion of the subject site - TCE at 6.4 ppb, nitrate at 12.4 ppm, and nitrite at 4.4 ppm in January 1992

- GW-1-305, near southeast corner of the subject site - TCE at 3.6 ppb, nitrate at 10.6 ppm, and nitrite at 3.9 ppm in January 1992

TCA, DCE and CCl_4 were reported as "not detected" in all wells during the fourth quarter. TDS did not exceed the SMCL for drinking water in the subject site wells. The decrease in nitrates, coupled with the increase in nitrite levels, suggested possible laboratory error associated with the reported nitrite concentrations, which was supported by a comparison of data from two laboratories.

- ***Work Plan/Sampling Plan, Soil Characterization*** report, prepared by TAGA for ASAC, dated December 19, 1991, revised March 30, 1992

The purpose of this plan was to describe the scope of work, project organization, and schedule for the soil characterization at the facility, as part of the North Hollywood Master Plan for the assessment and remediation of the site. The planned work was to include soil gas surveys, soil borings, and sample collection in conjunction with field screening, laboratory analyses, and vapor well installation, sampling, and analysis. The objective was to identify site locations, if any, where the soil had been impacted by site operations. The types of contaminants in the soil were to be identified and quantified through a phased approach, consisting of a soil gas survey and installation of test borings in outside areas, followed by inside areas where former manufacturing and chemical processes occurred, including storage areas.

This report indicates previous site remediation included removal of USTs and soil by Leighton and Associates in 1985 and 1986. Specifically, four USTs were reported to have been removed from an area near the northwest corner of the subject site, at which time VOC contamination was not detected. One UST and associated shallow soils were reported to have been removed from an area near the southwest corner of the subject site (former Tank 13), at which time TCA, PCE, TCE and total petroleum hydrocarbons (TPH) were detected at concentrations exceeding the MCLs.

- ***Phase I Site Characterization*** report, prepared by TAGA for ASAC, dated February 17, 1992

This report concluded that groundwater flow direction beneath the site varied from southwest (when influenced by nearby municipal groundwater withdrawals) to southeast; VOC and nitrate concentrations exceeding federal and California MCLs

were detected in monitoring wells on the subject site; VOC concentrations in monitoring wells located on the subject site had decreased significantly between September 1991 and January 1992; and that additional monitoring wells would be necessary to fully evaluate the impacts of both onsite and offsite potential sources. The highest concentrations of TCE, DCE, and TCA were detected in the central-west portion of the subject site, and this area was to be fully investigated during the Phase II site characterization. Based on the groundwater flow direction fluctuation by as much as 90 to 100 degrees (southwest to southeast), it was concluded that the additional upgradient wells in the north-central and northwest portions of the site might confirm an offsite source area north or northwest of the site. TCE and PCE plumes identified in association with the San Fernando Valley Groundwater Basin (SFVGWB) indicated that offsite sources upgradient of the site existed, and may be responsible for part of the elevated VOC concentrations observed at the subject site.

- ***First Quarter 1992 Groundwater Monitoring Report***, prepared by TAGA for ASAC, dated April 30, 1992

  Groundwater levels were reported to have declined 3 to 4 feet between February 19 and April 1, 1992, indicating increased municipal pumping from selected wells with the North Hollywood well field, located south and southwest of the subject site. Groundwater flow direction was reported to be to the south and south-southwest. The following concentrations were detected in March 1992 at monitoring wells located on the subject site:

  - GW-2-301, near northwest corner of the subject site - TCE at 31 ppb, PCE at 0.58 ppb, DCE at 2.4 ppb, TCA at 2.5 ppb, nitrate at 11.4 ppm, and carbon tetrachloride (CCl_4) at 0.57 ppb

  - GW-3-305, near central-west portion of the subject site - TCE at 820 ppb, DCE at 11 and 13 ppb, TCA at 22 ppb, dichloroethane (DCA) at 6.6 ppb, and nitrate at 15.8 ppm

  - GW-1-305, near southeast corner of the subject site - TCE at 130 ppb, PCE at 1.7 ppb, DCE at 3.1 and 3.0 ppb, TCA at 5.1 ppb, DCA at 1.3 ppb, and nitrate at 10.9 ppm

  TCE and CCl_4 were reported to be the only VOCs exceeding federal and California MCLs. TDS, sulfate, and chloride concentrations were reported to be "well within" the SMCL for drinking water. Nitrate concentrations exceeded the MCL in all monitoring

wells. However, nitrites were not detected, which supported TAGA's prior contention that the previous levels detected were due to laboratory error. This was further supported by a comparison of data from two laboratories, indicating the data were comparable and that nitrites were not detected.

- ***Second Quarter 1992 Groundwater Monitoring Report***, prepared by TAGA for ASAC, dated July 13, 1992

  Groundwater levels were reported to have declined approximately 2 to 3 feet since the first quarter, in response to increased groundwater withdrawals from municipal wells. Groundwater flow direction was reported to be to the south-southwest. The following concentrations were detected in May 1992 at monitoring wells located on the subject site:

  - GW-2-301, near northwest corner of the subject site - TCE at 83 ppb, PCE at 1.9 ppb, DCE at 13 ppb, TCA at 12 ppb, nitrate at 10.6 ppm, and carbon tetrachloride (CCl_4) at 3.3 ppb

  - GW-3-305, near central-west portion of the subject site - TCE at 160 ppb, PCE at 2.0 ppb, TCA at 7.5 ppb, DCE at 6.6 ppb, and nitrate at 15.6 ppm

  - GW-1-305, near southeast corner of the subject site - TCE at 58 ppb, PCE at 1.4 ppb, DCE at 3.3 ppb, TCA at 3.1 ppb, nitrate at 14.9 ppm, and CCl_4 at 0.85 ppb

  TCE, DCE, and CCl_4 were reported to exceed federal and California MCLs. TDS, sulfate, and chloride concentrations were reported to be "well within" the SMCL for drinking water. Nitrate concentrations exceeded the MCL in all monitoring wells.

- ***Third Quarter 1992 Groundwater Monitoring Report***, prepared by TAGA for ASAC, dated October 8, 1992

  Groundwater levels were reported to have declined approximately 8 feet since May 1992, in response to increased groundwater withdrawals from municipal wells. Groundwater flow direction was reported to be to the south-southwest. The following concentrations were detected in August 1992 at monitoring wells located on the subject site:

- GW-2-301, near northwest corner of the subject site - TCE at 150 ppb, PCE at 2.3 ppb, DCE at 17 ppb, TCA at 15 ppb, nitrate at 9.1 ppm, and carbon tetrachloride (CCl_4) at 3.8 ppb

- GW-3-305, near central-west portion of the subject site - TCE at 240 ppb, PCE at 3.3 ppb, TCA at 13 ppb, DCE at 2.8 and 13 ppb, and nitrate at 15.5 ppm

- GW-1-305, near southeast corner of the subject site - TCE at 100 ppb, PCE at 2.1 ppb, DCE at 1.4 and 5.5 ppb, TCA at 4.3 ppb DCA at 0.51 ppb, nitrate at 17.3 ppm, and CCl_4 at 1.6 ppb

TCE, DCE, and CCl_4 were reported to exceed federal and California MCLs. TDS exceeded the SMCL in all monitoring wells except GW-2-301. Nitrate concentrations exceeded the MCL in all monitoring wells except GW-2-301. Sulfate and chloride concentrations were again reported to be "well within" the SMCL for drinking water.

- ***Sampling and Analytical Plan for Groundwater Monitoring Program*** report, prepared by Science and Engineering Analysis Corporation (SEACOR) for ASAC, dated October 30, 1992

  This plan was prepared for compliance with an existing groundwater monitoring program at the facility, and its purpose was to monitor selected chemical compounds in groundwater beneath the site. The work was reported to be required by the RWQCB and was to be conducted in accordance with the RWQCB "Groundwater Monitoring and Reporting Guidelines." The plan included a description of the site background, sampling objectives, sample location and frequency, sample designation, and sample handling and analysis.

  The site was also identified as located within the North Hollywood Operable Unit of the North Hollywood Well Field designated by the U.S. Environmental Protection Agency (EPA) on the National Priorities List (NPL). Allied-Signal was named by the EPA as a potentially responsible party (PRP), in addition to 12 other parties.

- ***Results of Groundwater Monitoring, January 1993*** report, prepared by SEACOR for Allied Signal Aerospace (ASA), dated February 12, 1993

  This report indicates the fourth quarter 1992 monitoring was conducted in accordance with the RWQCB Well Investigation Program (WIP) guidelines. Groundwater levels beneath the site were reported to have risen approximately 9.5

feet during the period between November 1992 and January 1993. Groundwater flow direction was reported to have changed from a westerly direction in November 1992 to a more northerly direction in December 1992 and January 1993.

Groundwater monitoring wells located on the subject site and previously identified as GW-2-301, GW-3-305, and GW-1-305 are now referred to as GW-2, GW-3, and GW-1, respectively. The following concentrations were detected in monitoring wells located on the subject site:

- GW-2, near northwest corner of the subject site - TCE at 24 ppb, PCE at 0.71 ppb, DCE at 0.64 ppb, TCA at 0.54 ppb, and nitrate at 69 ppm

- GW-3, near central-west portion of the subject site - TCE at 66 ppb and nitrate at 66 ppm

- GW-1, near southeast corner of the subject site - TCE at 54 ppb and nitrate at 45 ppm

Nitrate and TCE were detected at concentrations above their respective MCLs in all six wells at the facility (three located on the subject site). The nitrate concentrations were the highest detected to date. All other VOCs detected were at concentrations below their respective MCLs. CCl_4 previously detected in GW-1 and GW-2, was not detected during this sampling event.

- ***Results of Groundwater Monitoring, First Quarter 1993*** report, prepared by SEACOR for ASA, dated April 12, 1993

Groundwater levels beneath the site were reported to have risen between 5.3 and 6.8 feet during the period between February and March 1993, and the groundwater flow direction was reported as northeasterly beneath the subject site in February and March 1993. The following concentrations were detected in monitoring wells located on the subject site:

- GW-2, near northwest corner of the subject site - TCE at 19 ppb, PCE at 0.62 ppb, and nitrate at 64 ppm

- GW-3, near central-west portion of the subject site - TCE at 47 ppb and nitrate at 60 ppm

- GW-1, near southeast corner of the subject site - TCE at 25 ppb, nitrate at 42 ppm, DCE at 0.71 ppb, and dichlorodifluoromethane (DCDFM) at 1.4 ppb

Nitrate and TCE were detected at concentrations above their respective MCLs in all six wells at the facility (three located on the subject site). All other VOCs detected were at concentrations below their respective MCLs. DCDFM was not detected in previous sampling events.

- ***Work Plan for Well Abandonment*** report, prepared by SEACOR for the RWQCB on behalf of ASA, dated April 14, 1993.

  This report describes the tasks proposed in order to abandon a monitoring well (W-1), installed in the southwest portion of the subject site by Leighton and Associates in April 1987. The purpose of abandoning the well was to prevent potential cross-communication of aquifers beneath the ASA property.

- ***Outside Soil Boring Report (Interim Report)***, prepared by Groundwater Technology, Inc. (GTI) for ASAC, dated April 14, 1993 (A copying error obscured a portion of this report.)

  This report documents shallow areas of TPH-impacted soil, the highest concentration of which was reported to be 5,700 ppm at 1 foot bgs in the northwest portion of the subject site, near the former fuel tank area. All deeper samples collected from the seven borings drilled in that area contained less than 20 ppm of TPH at depths of 20 to 45 feet bgs. TPH was also detected on the central-west portion of the subject site at 100 ppm at 1 foot bgs, with less than 10 ppm at 20 feet bgs. Analytical results for polychlorinated biphenyls (PCBs) indicated localized areas of low concentrations (under 50 ppb) in all areas tested, except for the sample collected from a boring located near the east boundary of the site, which is approximately 200 to 300 feet east of the subject site.

  Eighteen VOCs were detected at the facility. Concentrations of toluene, acetone, 1,1,2-trichlorofluoroethane (TCFA), and methyl-ethyl-ketone (MEK) were found on the subject site – TCFA and acetone at 300 ppb and 65 ppb, respectively, near the northwest corner (former UST area); TCFA and toluene at 66 ppb and 54 ppb, respectively, in the central-west portion; acetone at 60 ppb in the central-east portion; toluene at 154 ppb near the southeast corner; and acetone, TCFA, and TCE at 10 ppb, 5 to 37 ppb, and 3 ppb, respectively, in the southwest corner (Tank 13 area).

Metal analyses indicated all metal concentrations from outdoor boring locations were below the total threshold limit concentration (TTLC) levels. Some analytical results of lead from shallow soil samples in the northwest portion (former fuel tanks) indicated elevated levels in comparison to other soil samples. No information was provided with regard to soluble threshold limit concentrations (STLC) in this report.

- ***Results of Groundwater Monitoring, Second Quarter 1993*** report, prepared by SEACOR for ASA, dated July 12, 1993

  Groundwater levels beneath the site were reported to have risen between 5.63 and 8.47 feet during the period between March and June 1993, and the groundwater flow direction was reported as northeasterly beneath the subject site in March, May, and early June 1993, and southeasterly in mid June 1993. The following concentrations were detected in monitoring wells located on the subject site:

  - GW-2, near northwest corner of the subject site - TCE at 48 ppb and nitrate at 64 ppm
  - GW-3, near central-west portion of the subject site - TCE at 2,200 ppb and nitrate at 56 ppm
  - GW-1, near southeast corner of the subject site - TCE at 91 ppb, nitrate at 38 ppm, DCE at 2.9 and 5.0 ppb, TCA at 3.0 ppb, and PCE at 4.9 ppb

  TCE was detected in the subject site wells at concentrations above the MCLs, and nitrate was detected in wells GW-2 and GW-3 above the MCL. VOC concentrations in the subject site wells have increased since the March 1993 monitoring event.

- ***Report of Well Abandonment***, prepared by SEACOR for ASA, dated July 21, 1993

  This report documents abandonment of monitoring well W-1, located in the southwest corner of the subject site, on June 30, 1993.

- ***Investigation Report, Shallow Soil Borings***, prepared by GTI for ASA, dated July 16, 1993 (Page ii, of the Executive Summary was missing from this report.)

  A total of 141 borings were drilled from January to April 1993 and a total of 658 soil samples were collected and analyzed based on the type of operations previously performed in the areas of potential contamination. Several areas of significant TPH

concentrations were identified in the northwest portion of the subject site. Concentrations of VOCs were detected in the central-west and northwest portions of the subject site. All areas investigated during drilling indicated a significant decrease in VOC concentrations with depth, below approximately 20 feet bgs. Significant chromium concentrations were detected in the central-west portion of the subject site, the vertical extent of which was not defined in all borings. A maximum concentration of 1,700 ppm total chromium was recorded at a depth of 5 feet. Total chromium concentrations were reported to generally decrease with depth to levels under 25 ppm; however, 233 ppm was detected at 40 feet bgs in one boring. The highest concentration of chromium VI was reported to be 82 ppm, the highest STLC value of which was 8.79 ppm.

Soil samples from other areas investigated during drilling contained low to nondetectable levels of contaminants. Additional investigation was suggested to further delineate vertical and lateral areas of concern, which were to be provided as a result of step-out and deeper borings.

- ***Soil Gas Survey Report***, prepared by GTI for ASA, dated July 30, 1993

The purpose of the soil gas survey was to evaluate the potential presence of VOCs in the subsurface soil at the site. The survey was conducted in two phases from December 1992 to January 1993, and in June and July 1993. Key VOC constituents identified during the survey were reported to be TCA, TCE, PCE, DCE, and DCA. No concentration of any single VOC constituent exceeded 100 ppb, with most samples containing less than 10 ppb total VOCs. Seven general areas of elevated VOCs were identified from mapping of the soil gas data, two of which were located in the central area and the southwest area of the subject site.

- ***Results of Groundwater Monitoring, Third Quarter 1993*** report, prepared by SEACOR for ASA, dated September 7, 1993

Groundwater levels beneath the site were reported to have risen between 6.77 and 8.34 feet during the period between June and August 1993, and the groundwater flow direction was reported as northeasterly beneath the subject site. The following concentrations were detected in monitoring wells located on the subject site:

- GW-2, near northwest corner of the subject site - TCE at 48 ppb and nitrate at 66 ppm

- GW-3, near central-west portion of the subject site - TCE at 49 ppb and nitrate at 66 ppm

- GW-1, near southeast corner of the subject site - well was not sampled due to problems with the dedicated pump, possibly as a result of damage to the well during site demolition

TCE and nitrate were detected in the subject site wells at concentrations above the MCLs. However, TCE levels were lower than those detected in the June 1993 monitoring event.

- ***Step-out and Deeper Soil Boring Report***, prepared by GTI for ASA, dated September 15, 1993

The objective of this assessment was to further evaluate the nature and extent of contamination in impacted areas delineated during the initial site assessment (*Investigation Report, Shallow Soil Borings*, prepared by GTI for ASA, dated July 16, 1993 - see above). Fifty-six additional borings were drilled between June 29 and July 14, 1993, ranging in depth from 1 to 65 feet below grade. Data collected during both the deep and shallow boring assessments were used to generate soil isoconcentration maps illustrating the depth-specific lateral distribution of total VOCs and TPH across the site, and a series of area-specific cross-sections depicting the vertical and lateral distribution of total VOCs, TPH, and chromium.

Vertical and lateral delineation of TPH concentrations greater than 100 ppm was determined at the subject site. Nine areas of TPH concentrations greater than 100 ppm between 1 and 4 feet below grade were delineated in the northwest, central, and southeast portions of the subject site. Seven of these nine areas had TPH concentrations greater than 100 ppm between 5 and 9 feet below grade, and three of those seven areas, had TPH concentrations greater than 100 ppm between 10 and 14 feet below grade. One of the three areas is located near the northwest portion of the subject site, and the other two are located in the central portion.

Vertical and lateral delineation of VOC concentrations was determined at the subject site. Nine areas of VOC concentrations greater than 10 ppb between 1 and 4 feet and between 5 and 9 feet below grade were delineated on the subject site. Eight of these nine areas had VOC concentrations greater than 10 ppb between 10 and 14 feet below grade. These eight areas are located predominantly on the west and central portions of the subject site.

Elevated concentrations of total chromium and chromium VI (TTLCs of 1,700 ppm and 220 ppm, respectively; and an STLC of chromium VI at 21 ppm) were identified in the central-west portion of the subject site, the vertical extent of which was not defined.

- ***Results of Groundwater Monitoring, Fourth Quarter 1993*** report, prepared by SEACOR for ASA, dated January 27, 1994

  Six onsite groundwater monitoring wells (three on the subject site) and four offsite groundwater monitoring wells were sampled during this monitoring event. Groundwater levels beneath the site were reported to have risen between 7.48 and 8.87 feet during the period between September and December 1993, and the groundwater flow direction was reported as easterly beneath the subject site. The following concentrations were detected in monitoring wells located on the subject site:

  - GW-2, near northwest corner of the subject site - TCE at 29 ppb, PCE at 1.7 ppb, TCA at 0.37 bbp, DCE at 0.4 ppb, and nitrate at 61 ppm

  - GW-3, near central-west portion of the subject site - TCE at 15 ppb, TCA at 0.6 ppb, DCE at 0.4 ppb, PCE at 1.6 ppb, nitrate at 57 ppm, and toluene at 0.2 ppb

  - GW-1, near southeast corner of the subject site - TCA at 0.3 ppb, DCA at 0.3 ppb, TCE at 4.4 ppb, PCE at 2.6 ppb, DCE at 2.1 ppb, nitrate at 36 ppm, toluene at 0.3 ppb, and xylenes at 0.3 ppb

  TCE and nitrate were detected in subject site wells GW-2 and GW-3 at concentrations above the MCLs. All other VOCs detected in the groundwater samples collected were present at concentrations below their respective MCLs. The PCE and TCE concentrations detected in subject site well GW-1 have decreased since the last sampling event for that well.

- ***Results of Groundwater Monitoring, First Quarter 1994*** report, prepared by SEACOR for ASA, dated May 31, 1994

  Six onsite groundwater monitoring wells (three on the subject site) and four offsite groundwater monitoring wells were sampled during this monitoring event. Groundwater levels beneath the site were reported to have risen between 3.21 and 4.99 feet during the period between November 1993 and March 1994, and the

groundwater flow direction was reported as southeasterly beneath the subject site. The following concentrations were detected in monitoring wells located on the subject site:

- GW-2, near northwest corner of the subject site - TCE at 890 ppb and nitrate at 60 ppm
- GW-3, near central-west portion of the subject site - TCE at 15 ppb, TCA at 0.31 ppb, DCE at 0.31 and 0.26 ppb, and nitrate at 60 ppm
- GW-1, near southeast corner of the subject site - TCA at 1.4 ppb, DCE and 1.0 and 3.0 ppb, TCE at 62 ppb, PCE at 1.7 ppb, and nitrate at 49 ppm

TCE and nitrate were detected in the subject site wells at concentrations above the MCLs. All other VOCs detected in the groundwater samples collected were present at concentrations below their respective MCLs. TCE concentrations detected in wells GW-1 and GW-2 increased between one and two orders of magnitude from the November 1993 to the February 1994 sampling event, whereas the TCE concentrations in GW-3 remained consistent during this period. Pumping of the production wells in the Tujunga and Rinaldi-Toluca well fields was reported to have increased since the January 1994 earthquake, which may account for the increase in TCE concentrations detected in wells at the subject site.

- ***Remedial Action Plan, Shallow Soil Impacted by Total Petroleum Hydrocarbons*** report, prepared by Hydrologue, Inc. for ASA, dated May 1994

The report was prepared regarding remediation of the vadose zone at the facility, and was focused on an excavation plan and treatment option for soil containing greater than 1,000 ppm TPH. An estimated 607 cubic yards of impacted soil were reported to be located in the northwest portion of the subject site, where four USTs and a deep hole boring sump were formerly located. An estimated 305 cubic yards of impacted soil was reported to be located in the central-west portion of the subject site, where a former plating area was located. An estimated 28 cubic yards of impacted soil was reported to be located in the central portion of the subject site, where a former heat treatment area was located. An estimated 166 cubic yards of impacted soil was reported to be located in the central-east portion of the subject site, where a sump was formerly located.

Hydrologue proposed to excavate and treat the TPH-impacted soil onsite in a low temperature thermal desorption (LTTD) system, which vaporizes organic contaminants from the soil. The resulting petroleum hydrocarbon fumes and vapors were to be treated in a high temperature thermal oxidizer. The maximum concentration of total recoverable petroleum hydrocarbons (TRPH) in the treated soil was proposed to be 100 ppm, with benzene at 0.1 ppm, toluene at 10 ppm, ethylbenzene at 6.8 ppm, xylenes at 17.5 ppm, and polynuclear aromatic hydrocarbons (PAH) at 1 ppm. Treated soil would then be placed in 6- to 8-inch lifts, compacted to at least 90 percent of the maximum dry density, and placed under the supervision and testing of a California Registered Geotechnical Engineer.

- ***Remedial Action Plan, Shallow Soil Impacted by Volatile Organic Compounds*** report, prepared by Hydrologue, Inc. for ASA, dated May 1994

  This report was prepared regarding the feasibility of a vapor extraction system (VES) for an eventual vadose zone remediation of VOC-impacted soil. The proposed work would consist of the installation of multi-level gas probes, to be sampled and analyzed; installation, development, sampling, and analysis of additional monitoring wells; delineation of onsite and offsite gas plumes; investigating the feasibility of a VES system to remediate the vadose zone; performing a vapor extraction test; and installing vapor extraction and air injection wells.

- ***Addendum to Remedial Action Plan, Shallow Soil Impacted by Total Petroleum Hydrocarbons*** report, prepared by Hydrologue, Inc. for ASA, dated September 1994

  This report provides discussions on the plan for vertical delineation of TPH-impacted soil at five undefined locations, based on the data collected by GTI; the detailed sampling plan for excavated soil and treated soil; the rationale for the proposed practical action levels (PALs) and cleanup levels; engineering cross-section of the major excavated areas; and a description of the soil treatment system.

- ***Supplementary Site Investigations and Amended Remedial Action Plan, Shallow Soil Impacted by Total Petroleum Hydrocarbons*** report, prepared by Hydrologue, Inc. for ASA, dated September 19, 1994

  Objectives of the report were to provide results of a supplementary site investigation on shallow soil impacted by TPH at five previously undefined locations, based on data collected by GTI; and to compile and amend the previously submitted work

plan and its addendum for soil remediation, including excavation, treatment, and backfilling shallow soil impacted by TPH using LTTD technology.

Hydrologue drilled and sampled several borings in proximity to those areas where the vertical extent of the TPH-impacted soil were questioned by GTI. The collected samples were analyzed onsite and offsite for total extractable hydrocarbons (TEH) and for extended carbon chain breakdown. Analytical results of the soil samples collected from all borings confirmed that the depth of TPH-impacted soil at these locations did not exceed 20 feet bgs, and the vertical extent of TPH-impacted soil for all areas considered questionable by GTI was defined.

Hydrologue proposed to excavate the TPH-impacted soil and treat it onsite using LTTD technology. The excavation areas were selected at locations where TPH and/or VOC concentrations of impacted soil were above proposed PALs. PALs are concentration levels of hydrocarbons in the soil below which the impacted soil may be left in place at a site.

- ***Results of Groundwater Monitoring, Second Quarter 1994*** report, prepared by SECOR for ASA, dated October 27, 1994

Six onsite groundwater monitoring wells (three on the subject site) and four offsite groundwater monitoring wells were sampled during this monitoring event. Groundwater levels beneath the site were reported to have risen between 5.58 and 6.26 feet during the period between March and June 1994, and the groundwater flow direction was reported as easterly beneath the subject site. The following concentrations were detected in monitoring wells located on the subject site:

- GW-2, near northwest corner of the subject site - TCE at 9.6 ppb, PCE at 0.99 ppb, DCE at 0.49 ppb, and nitrate at 68 ppm

- GW-3, near central-west portion of the subject site - TCE at 6.0 ppb, PCE at 0.71 ppb, and nitrate at 67 ppm

- GW-1, near southeast corner of the subject site - TCE at 3.5 ppb, DCE and 1.1 and 3.0 ppb, PCE at 1.4 ppb, and nitrate at 37 ppm

TCE and nitrate were detected in subject site wells GW-2 and GW-3 at concentrations above the MCLs. All other VOCs detected in the groundwater samples collected were present at concentrations below their respective MCLs. TCE

concentrations detected in all 10 monitoring wells have decreased as much as two orders of magnitude from the February 1994 sampling event to the May 1994 sampling event. Increased pumping of the production wells in the Tujunga and Rinaldi-Toluca well fields is reported to potentially account for the fluctuation in TCE concentrations detected in wells at the subject site.

- ***Addendum to Remedial Action Plan, Shallow Soil Impacted by Volatile Organic Compounds*** report, prepared by Hydrologue, Inc. for ASA, dated December 9, 1994

  This report provides responses to specific requests by the RWQCB for information in response to the original plan, dated May 1994. The RWQCB requested information/ discussion in the following three areas:

  - An evaluation of the soil vapor survey and soil matrix data completed on the site and a discussion on the soil contamination problems at the site. Rationale for installation of the multi-level gas probes and additional soil gas investigation work plan.

  - A scaled facility map including potential sources of contamination, isoconcentration map of VOCs, and locations of the proposed soil gas probes.

  - Rationale of an additional groundwater investigation work plan based on the evaluation of groundwater monitoring data.

  - The original work plan was characterized as not meeting the requirements prescribed by the RWQCB.

  Hydrologue addressed each of the above areas and modified the work plan as necessary.

- ***Closure Report, Excavation and Treatment of Shallow Soil Impacted by Total Petroleum Hydrocarbons***, prepared by Hydrologue, Inc. for ASA, dated January 28, 1995

  This report states that collected data from all subsurface investigations shows that the extent of TPH-impacted soil requiring remediation was limited to depths of less than 20 feet bgs, with the exception of two localized areas. A PAL of 1,000 ppm of TPH was proposed and approved by the RWQCB, based on the considerable distance between TPH-impacted soil and groundwater at the site, making impact to

groundwater extremely remote. The TPH cleanup level was established at 100 ppm, based on the original TPH concentration of the soil and efficiency of LTTD for hydrocarbon destruction. The average TPH concentration of the impacted soil was approximately 3,000 ppm. The BTEX and halogenated VOC cleanup levels were established at 10 times the MCLs. The PAH cleanup level was established as non-detect, the most conservative level. No PAHs were detected in the samples collected from the site.

The conclusions and recommendations section of this report indicated that excavation areas C and D (located near the northwest and central portions of the subject site, respectively) were logistically designed to leave the adjacent chromium-impacted soil undisturbed. Analysis of soil for chromium contamination was not reported to have been conducted as part of the closure activities associated with TPH-impacted soil.

TPH-impacted areas on the subject site were identified in the northwest portion of the subject site, where four USTs and a deep hole boring sump were formerly located; in the central-west portion of the subject site, where a former plating area was located; in the central portion of the subject site, where a former heat treatment area was located; and in the central-east portion of the subject site, where a sump was formerly located.

Excavation and treatment activities of TPH-impacted soil began in September 1994. A total of 13,629 cubic yards of TPH-impacted and overburden clean soil were excavated from the areas with reported TPH concentrations above the PALs. Excavation activities were completed in October 1994, after confirmation sample results indicated that all previously reported TPH-impacted soil with concentrations above PALs had been successfully removed. Confirmation soil sample analytical results indicated that the zone of TPH-impacted soil was successfully delineated during excavation activities and that all reported TPH-impacted soil was successfully removed. Very low to negligible halogenated VOC and BTEX concentrations, detected in confirmation samples with the highest TPH concentrations, indicated that shallow soil containing VOCs in the area of reported TPH-impacted soil was properly removed and remediated. A total of 142 samples was collected from treated soil stockpiles. The average TPH concentration of treated soil samples was 16 ppm. No BTEX was detected in any of these samples. Two samples indicated the presence of halogenated VOCs, but at concentrations below 11 ppb. Clean and treated soil was "benched" into the excavation walls and compacted to at least 90 percent of maximum dry density. All clean soil stockpiled adjacent to the excavation was used

to backfill the deeper part of the excavation, and treated soil was used to backfill to grade surface; the clean and treated soil were not mixed.

Hydrologue recommended no further action with regard to the shallow soil impacted with TPH, and requested closure from the RWQCB for this phase of soil remediation at the site.

- ***Compaction Report, Excavation and Treatment of Shallow Soil Impacted by Total Petroleum Hydrocarbons***, prepared by Hydrologue, Inc. for ASA, dated February 7, 1995

  This report presents the results of observation and testing performed in October and November 1994, during the operation of fill placement and compaction of soil excavated from the site and remediated.

  The TPH-impacted area located in the northwest portion of the subject site, where four USTs and a deep hole boring sump were formerly located, was identified as Area C. The excavated area was irregular in shape, similar to an inverted pyramid, with an average length (east-west) of 110 feet and an average width (north-south) of 70 feet. The maximum excavation depth was 19 feet. The reportedly localized deep TPH-impacted soil, to a depth of 25 feet bgs, was removed using an auger drill rig prior to excavation of the area.

  The TPH-impacted area located in the central-west portion of the subject site, where a former plating area and vapor degreaser were located, was identified as Area D. The excavated area was irregular in shape, similar to an inverted pyramid, with an average length (east-west) of 80 feet and an average width (north-south) of 50 feet. The maximum excavation depth was 15 feet.

  The TPH-impacted area located in the central portion of the subject site, where a former heat treatment area was located; and in the central-east portion of the subject site, where a sump was formerly located, was identified as Area E. The excavated area was irregular in shape, approximately an inverted pyramid, with an average length (east-west) of 60 feet and an average width (north-south) of 40 feet. The maximum excavation depth was 10 feet.

  An additional TPH-impacted area was identified near the southeast corner of the subject site, where a portion of the former "Skydrol" building was located. The total excavated area was irregular in shape, approximately a rectangle, with an average

length (east-west) of 260 feet and an average width (north-south) of 80 feet. Approximately 90 feet of the total excavation length was located on the subject site. The maximum excavation depth was approximately 22 feet. The reportedly localized deep TPH-impacted soil, to a depth of 40 feet bgs, was removed using an auger drill rig prior to excavation of the area.

Five other small areas located on the center portion of the subject site were also excavated and backfilled with treated and clean soil.

- According to a letter from the RWQCB to AlliedSignal, Inc., dated March 8, 1995, no further action was required by the RWQCB with respect to TPH-impacted shallow soils, which the RWQCB determined had been remediated to acceptable levels. It was explicitly stated that the no further action status applied to the TPH-impacted soils only.

- ***Bimonthly Soil Gas Monitoring*** report, prepared by Hydrologue, Inc. for ASA, dated August 10, 1995

  This document reports that 12 soil gas samples were collected from three permanently installed soil vapor probe wells located on the subject site. Low concentrations of VOCs, including TCE, TCA, DCE, DCA, and total volatile petroleum hydrocarbons, were detected in the soil gas samples collected from the wells near the center (MLG-6), southwest (MLG-3), and southcentral (MLG-2) portions of the subject site. A well located in the northwest corner was not sampled. TCE concentrations ranged from a low of 7.5 ppb at 100 feet in MLG-2 to a high of 322.8 ppb at 200 feet in MLG-3. The higher concentrations at greater depths were speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone, since shallower probe samples contained consistently lower concentrations.

- ***Results of Groundwater Monitoring, Third and Fourth Quarters 1994*** report, prepared by SECOR for ASA, dated August 17, 1995

  Six onsite groundwater monitoring wells (three on the subject site) and four offsite groundwater monitoring wells were sampled during the third quarter monitoring event, and nine (two on the subject site) were sampled during the fourth quarter event. Groundwater flow direction was reported as ranging from southwesterly to northwesterly beneath the subject site during these monitoring events.

Nitrate was detected at concentrations above the MCL in samples collected from the subject site wells during the August 1994 event, and in samples collected from subject site wells GW-2 and GW-3 during the December 1994 event.

TCE was detected at concentrations above the MCL in the subject site wells during the August and September 1994 events; in subject site well GW-2 during the November 1994 event; and in subject site wells GW-2 and GW-3 during the December 1994 event. CCl_4 was detected at concentrations above the MCL in subject site well GW-2 in August, September, November, and December 1994. Cis-1,2-DCE was detected in concentrations above the MCL in subject site well GW-1 in August 1994, and subject site wells GW-1 and GW-3 in September 1994. 1,1-DCE was detected in concentrations above the MCL in subject site well GW-3 in August 1994, and in subject site wells GW-2 and GW-3 in September 1994. DCA was detected in concentrations above the MCL in subject site well GW-3 during the September 1994 event. All other samples collected from the subject site wells during the events associated with the third and fourth quarters had VOC concentrations below the MCLs.

TCE concentrations detected in subject site wells GW-1 and GW-2 increased as much as three orders of magnitude between May 1994 and August/September 1994, then decreased up to two orders of magnitude between August/September 1994 and November/December 1994. Subject site well GW-1 was damaged by the treatment contractor during the onsite remediation of shallow soil impacted by TPH; subsequently, no samples were collected from the well during the December 1994 event. TCE concentrations detected in wells GW-1 and GW-2 increased as much as three orders of magnitude from the May 1994 event to the August/September 1994 event, and decreased up to two orders of magnitude from the August/September 1994 event to the November/December 1994 event. An offsite source, together with increased pumping of the production wells in the Tujunga and Rinaldi-Toluca well fields is reported to potentially account for the fluctuation in TCE concentrations detected in wells at the subject site.

- ***Soil Disposal Activities*** letter, prepared by Hydrologue, Inc. for AlliedSignal Inc., dated October 9, 1995

This letter provides documentation of offsite disposal of approximately 120 cubic yards of containerized nonhazardous soil, and approximately 75 tons of nonhazardous construction/demolition debris in September 1995. The nonhazardous soil was transported to the Bradley Landfill and Recycling Center

located in Sun Valley, California, and the nonhazardous construction/demolition debris was disposed offsite at the Strathern Landfill, also located in Sun Valley. The disposal was reported to have been performed in accordance with RWQCB requirements under an RWQCB Waste Discharge Permit.

- ***Bimonthly Soil Gas Monitoring, July 1995*** report, prepared by Hydrologue, Inc. for ASA, dated November 14, 1995

  This document reports that 12 soil gas samples were collected from three permanently installed soil vapor probe wells located on the subject site. The well located in the northwest corner was not sampled. TCE concentrations ranged from a low of 14.6 ppb at 100 feet in MLG-6 (central area) to a high of 190 ppb at 200 feet in MLG-2 (southcentral area). The higher concentrations at greater depths were speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone.

- ***Bimonthly Soil Gas Monitoring, September 1995*** report, prepared by Hydrologue, Inc. for ASA, dated December 28, 1995

  This document reports that 12 soil gas samples were collected from three permanently installed soil vapor probe wells located on the subject site. The well located in the northwest corner was not sampled. TCE concentrations ranged from a low of 12.9 ppb at 100 feet in MLG-2 (southcentral area) to a high of 328 ppb at 200 feet in MLG-3 (southwest area). The higher concentrations at greater depths were speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone.

- ***Bimonthly Soil Gas Monitoring, November 1995*** report, prepared by Hydrologue, Inc. for ASA, dated January 18, 1996

  This document reports that 12 soil gas samples were collected from three permanently installed soil vapor probe wells located on the subject site. The well located in the northwest corner was not sampled. TCE concentrations ranged from a low of 15.2 ppb at 100 feet in MLG-2 (southcentral area) to a high of 372.5 ppb at 200 feet in MLG-3 (southwest area). The higher concentrations at greater depths were speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone.

- ***Bimonthly Soil Gas Monitoring, January 1996*** report, prepared by Hydrologue, Inc. for ASA, dated April 16, 1996

  This document reports that 12 soil gas samples were collected from three permanently installed soil vapor probe wells located on the subject site. The well located in the northwest corner was not sampled. TCE concentrations ranged from a low of 10.6 ppb at 100 feet in MLG-2 (southcentral area) to a high of 286.0 ppb at 200 feet in MLG-3 (southwest area). The higher concentrations at greater depths were speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone.

- ***Report Review*** letter, from the RWQCB to Allied Signal, Inc., dated May 20, 1996

  This letter provided RWQCB staff comments regarding the subject report, previous assessment work, and other information. The letter concluded that the data reviewed adequately evaluated subsurface conditions beneath the subject site. The RWQCB requested a work plan addressing soil contamination, or an appropriate response to their correspondence by June 28, 1996.

- ***Bimonthly Soil Gas Monitoring, March 1996*** report, prepared by Hydrologue, Inc. for ASA, dated June 14, 1996

  This document reports that 12 soil gas samples were collected from three permanently installed soil vapor probe wells located on the subject site. The well located in the northwest corner was not sampled. TCE concentrations ranged from a low of 16.0 ppb at 100 feet in MLG-6 (central area) to a high of 420 ppb at 200 feet in MLG-3 (southwest area). The higher concentrations at greater depths were speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone.

- ***Results of Groundwater Monitoring, First and Second Quarters 1995*** report, prepared by SECOR for ASA, dated July 19, 1996

  Two groundwater monitoring wells located on the subject site (GW-2 and GW-3) and four offsite groundwater monitoring wells were sampled during the first and second quarter 1995 monitoring events. Groundwater levels were reported to have increased between 9.55 and 13.98 feet at two offsite wells during the period between March and September 1995, and to have increased between 0.23 and 3.45 feet during the period between December 1994 and March 1995. Determination of an

average groundwater flow direction beneath the subject site is questionable, due to the transient nature of the groundwater system beneath the subject site.

Nitrate was detected at concentrations above the MCL in samples collected from subject site well GW-3 during the first quarter, and in samples collected from subject site wells GW-2 and GW-3 during the second quarter.

TCE was detected at concentrations above the MCL in subject site wells GW-2 and GW-3 during the first and second quarter. CCl_4 was detected at concentrations above the MCL in subject site wells GW-2 and GW-3; cis-1,2-DCE was detected at concentrations above the MCL in subject site well GW-3; 1,1-DCE was detected at concentrations above the MCL in subject site wells GW-2 and GW-3; and 1,1-DCA was detected at concentrations above the MCL in subject site well GW-3 during the March 1995 sampling event. CCl_4 concentrations were also detected above the MCL in samples collected from subject site well GW-3 during the second quarter. All other samples collected from the subject site wells during the events associated with the first and second quarters had VOC concentrations below the MCLs or nondetectable.

TCE concentrations detected in wells GW-2 and GW-3 increased up to two orders of magnitude from the November/December 1994 events to the March 1995 event. TCE concentrations detected in samples obtained from all wells tested decreased up to two orders of magnitude from the March 1995 event to the September 1995 event. An offsite source, together with increased pumping of the production wells in the Tujunga and Rinaldi-Toluca well fields is reported to potentially account for the fluctuation in TCE concentrations detected in wells at the subject site.

- ***Bimonthly Soil Gas Monitoring, May 1996*** report, prepared by Hydrologue, Inc. for ASA, dated August 30, 1996

This document reports that 12 soil gas samples were collected from three permanently installed soil vapor probe wells located on the subject site. The well located in the northwest corner was not sampled. TCE concentrations ranged from a low of 14.0 ppb at 100 feet in MLG-6 (central area) to a high of 515 ppb at 200 feet in MLG-3 (southwest area). It should be noted that the TCE concentrations within the 200-foot zone have increased significantly in this and the previous monitoring event. The higher concentrations at greater depths were speculated to be a result of off-gassing and upward migration from the groundwater, rather than downward migration through the vadose zone.

- ***Results of Groundwater Monitoring, Third and Fourth Quarters 1995*** report, prepared by SECOR for ASA, dated November 8, 1996

  Three groundwater monitoring wells located on the subject site and four offsite groundwater monitoring wells were sampled during the third and fourth quarter 1995 monitoring events. Groundwater levels were reported to have increased between 5.23 and 6.17 feet at two offsite wells during the period between September and November 1995, and to have decreased between 0.50 and 2.81 feet during the period between November and December 1995. Groundwater flow direction was reported to range from southeasterly in November 1995 to southwesterly in December 1995. The following concentrations were detected in December 1995 at monitoring wells located on the subject site:

  - GW-2, near northwest corner of the subject site - nitrate at 47 ppm, TCE at 50 ppb, 1,1-DCA at 0.53 ppb, PCE at 1.8 ppb, cis-1,2-DCE at 1.3 ppb, DCDFM at 0.76 ppb, 1,1,1-TCA at 2.2 ppb, 1,1-DCE at 4.9 ppb, and CCl_4 at 3.8 ppb

  - GW-3, near central-west portion of the subject site - nitrate at 38 ppm, TCE at 160 ppb, 1,1-DCE at 11 ppb, PCE at 2.4 ppb, cis-1,2-DCE at 1.5 ppb, 1,1-DCA at 0.98 ppb, CCl_4 at 5.0 ppb, DCDFM at 0.60 ppb, p-isopropyl toluene (p-IT) at 0.44 ppb, 1,1,1-TCA at 6.6 ppb, and bromodichloromethane (BDCM) at 0.25 ppb

  - GW-1, near southeast corner of the subject site - nitrate at 27 ppb, TCE at 25 ppb, PCE at 2.1 ppb, cis-1,2-DCE at 1.3 ppb, 1,1-DCA at 0.28 ppb, p-IT at 0.31 ppb, 1,1,1-TCA at 1.2 ppb, 1,1-DCE at 2.0 ppb, CCl_4 at 0.32 ppb, DCDFM at 1.4 ppb, p-IT at 0.29 ppb, and benzene at 0.19 ppb

  Nitrate was detected at concentrations above the MCL in samples collected from subject site well GW-2 during the fourth quarter.

  TCE was detected at concentrations above the MCL in subject site wells GW-1 and GW-2 in the third and fourth quarters. 1,1-DCE was detected at concentrations above the MCL in subject site well GW-3 in the fourth quarter. CCl_4 concentrations were detected above the MCL in subject site wells GW-2 and GW-3 in the fourth quarter. All other samples collected from the subject site wells during the events associated with the third and fourth quarters had VOC concentrations below their respective MCLs.

During the last 10 groundwater sampling events, concentrations of TCE in groundwater generally increased from November 1993 to February 1994, but subsequently decreased in several of the wells between February 1994 and May 1994. TCE concentrations again increased in all the wells between May 1994 and August/September 1994, then decreased between August/September 1994 and November/December 1994. TCE concentrations increased in samples from all the wells between November/December 1994 and March 1995, then decreased between March and September 1995. TCE concentrations detected in subject site wells GW-1 and GW-2 increased between one and two orders of magnitude from November 1993 to February 1994, whereas the TCE concentrations in subject site well GW-3 remained consistent during this period. However, TCE concentrations detected in samples from all wells decreased as much as two orders of magnitude from the February/March 1994 event to the May 1994 event. TCE concentrations detected in samples from all wells increased as much as three orders of magnitude from the May 1994 event to the August/September 1994 event, and samples from subject site wells GW-2 and GW-3 decreased up to two orders of magnitude from the August/September 1994 event to the November/December 1994 event. TCE concentrations detected in wells GW-2 and GW-3 increased up to two orders of magnitude from the November/December 1994 events to the March 1995 event, while TCE concentrations detected in samples obtained from subject site wells GW-2 and GW-3 decreased as much as two orders of magnitude from the March 1995 event to the September 1995 event.

TCE concentrations decreased in subject site wells GW-2 and GW-3 from September 1995 to November 1995, and decreased in GW-1 from 6,400 ppb in November 1994 to 7.0 ppb in November 1995. However, the TCE concentration detected in samples collected from all wells sampled increased up to two orders of magnitude from November 1995 to December 1995.

Pumping of production wells in the North Hollywood and the Rinaldi-Toluca well fields, and municipal aeration wells, together with an offsite source, are speculated to account for the fluctuation in TCE concentrations detected.

- ***Second Partial Consent Decree, United States of America and State of California, Plaintiffs, v. Allied-Signal, Inc., et al., Defendants***, 1996

- ***Site Closure Letter Report***, prepared by ASA for submittal to the RWQCB, dated April 25, 1997

  This document provides a summary of the subsurface investigations and remedial activities conducted at the former AlliedSignal/Bendix facility, and provides evaluation calculations, which were performed using procedures recommended by the U.S. EPA, California EPA, and the RWQCB. The results of the evaluations described in the report led to the conclusions that the project site had been thoroughly investigated and the extent of contamination defined; onsite sources of contamination had been removed; soil gas concentrations of chlorinated hydrocarbons in soil were below the applicable standards; statistically calculated concentrations of chromium in the soil were below the applicable standards; and residual concentrations of contaminants in the site subsurface presented no effective current or future hazard to human or ecological receptors. Case closure was requested based on these conclusions. It should be noted that STLC levels of chromium VI were identified to be in ppb; however, the concentrations reported were those previously identified in ppm. It is unclear which units were used in the statistical calculations referenced above.

- ***July 9, 1997, Meeting*** letter, from ASA to the RWQCB, dated July 18, 1997

  This letter was prepared to reiterate ASA's concurrence with regard to the RWQCB recommendations regarding ASA's April 25, 1997, request for site closure. This letter reports that the RWQCB agreed that no further requirements were needed with regard to VOC-related issues at the subject site; chromium-impacted soil would be removed to a maximum depth of 10 feet in locations with concentrations exceeding the RWQCB proposed cleanup criteria of July 8, 1997; and that one downgradient groundwater sample would be analyzed for chromium. According to Benny Dehghi of Allied Signal, clenaup criteria for chromium in soil was established as the preliminary remediation goals (PRGs) for soil at industrial sites, i.e., 450 ppm for total chromium and 64 ppm for chromium VI. This letter also mentions that monitoring activities at the site were stopped in accordance with recommendations made at an April 9, 1997, meeting with the RWQCB.

- ***Work Plan*** letter, from the RWQCB to ASA, dated July 29, 1997

  This letter indicates that the RWQCB received and reviewed the July 18, 1997, letter from ASA, and stated that ASA's proposed additional assessment and remediation at the subject site was in accordance with RWQCB requirements set forth in their

May 20, 1996, letter and discussed during April 9, 1997, and July 9, 1997, meetings with ASA. This letter also stated that a schedule must be submitted to the RWQCB prior to field work and that the work must begin by September 15, 1997.

- ***Progress Report*** letter, from ASA to the RWQCB, dated July 31, 1997

  This letter provides a summary of field activities conducted in accordance with ASA correspondence dated July 18, 1997. Former soil boring locations with the highest concentrations of chromium (identified by the RWQCB during the July 9, 1997, meeting) were located using site-wide survey data on July 29, 1997. Chromium-impacted soil was removed to a depth of 10 feet bgs. Confirmation soil samples were being submitted to a laboratory for chromium analysis. One groundwater sample (and duplicate) were collected from "downgradient" monitoring well for chromium analysis. Analytical results were to be provided to the RWQCB as they became available, and a closure letter report was to be submitted by August 20, 1997.

- Laboratory analysis results of soil and groundwater samples collected at the site on July 30, 1997, and analyzed by Quanterra Environmental Services

  Groundwater samples were collected from GW-3, located in the northwest portion of the subject site, and analyzed for chromium VI using test method 7196A and for total (presumed) chromium using test method 6010A. Chromium VI concentrations were reported to be nondetect and 1.4 ppm; total chromium concentrations were reported to be 0.93 and 1.4 ppm.

  Soil samples were collected from the central portion of the subject site, and analyzed for chromium VI using test method 7196A and for total chromium using test method 6010A. Chromium VI concentrations were reported to be 31.0 ppm 0.99 ppm, 0.34 ppm, 21.5 ppm, 3.2 ppm, 37.5 ppm, and nondetect. Total chromium concentrations were reported to be 850 ppm, 859 ppm, 30.7 ppm, 16.0 ppm, 2,280 ppm, 26.6 ppm and 1,650 ppm.

- ***Closure for Allied Signal Western Parcel*** letter, from the RWQCB to AlliedSignal, Inc., dated August 12, 1997

  This letter refers to the completion of chromium-impacted soil remediation, and soil vapor and groundwater sampling and analysis. Approximately 20 cubic yards of soil were reported as removed. Confirmation soil sampling analysis detected maximum

concentrations of 2,280 ppm total chromium and 37.5 ppm chromium VI. The preliminary remediation goals (PRGs) for total chromium and chromium VI in soil at industrial sites are 1,600 ppm and 230 ppm, respectively. Groundwater analysis detected a maximum concentration of 1.4 ppm for both total chromium and chromium VI. This letter further states that the RWQCB had no further soil assessment and remediation requirements with respect to the Well Investigation Program (WIP) for the subject site.

However, the RWQCB did state that, since groundwater analysis had detected concentrations of total chromium and chromium VI, at least two additional downgradient groundwater samples must be collected to generate sufficient data to determine onsite groundwater conditions. The RWQCB recommended that these samples be collected in February and July 1998.

This letter further stated that although the subject site was exempt from further assessment and remediation requirements with regard to the WIP, the Kaiser Permanente portion of the former Allied Signal site, located adjacent to the west of the subject site, was still subject to RWQCB oversight. It should also be noted that this letter points out that requirements of other agencies, such as the U.S. EPA, are not affected by the RWQCB's no further requirements determination, and such agencies may choose to make their own determination concerning the subject site.

- ***Results of Groundwater Monitoring, Third and Fourth Quarters 1996*** report, prepared by SECOR for ASA, dated October 15, 1997

Three groundwater monitoring wells located on the subject site (GW-1 through GW-3) and four offsite groundwater monitoring wells (GW-7 through GW-10) were sampled during the third and fourth quarter 1996 monitoring events. Groundwater elevations were also measured in three groundwater monitoring wells (GW-4 through GW-6) located on the adjacent Home depot property. Groundwater levels were reported to have decreased between 6.31 and 10.22 feet at two offsite wells during the period between July and October 1996, and to have decreased between 9.10 and 10.54 feet during the period between October and December 1996. The groundwater flow direction beneath the subject site, Kaiser Permanente property and western portion of the Home Depot property was reported to be southwesterly in October and December 1996 monitoring events. The groundwater flow direction beneath the eastern portion of the Home Depot property was reported to be south/southeasterly in October and December 1996 monitoring events. The

following concentrations were detected in October 1996 at the three monitoring wells located on the subject site:

- GW-1, near southeast corner of the subject site - nitrate at 31 ppb, TCE at 180 ppb, PCE at 5.5 ppb, cis-1,2-DCE at 4.5 ppb, 1,1-DCE at 17 ppb, 1,1-DCA at 2.7 ppb, 1,1,1-TCA at 12 ppb, and CCl_4 at 4 ppb

- GW-2, near northwest corner of the subject site - nitrate at 51 ppm, TCE at 190 ppb, PCE at 2.6 ppb, cis-1,2-DCE at 1.1 ppb, 1,1-DCE at 18 ppb, 1,1-DCA at 0.89 ppb, 1,1,1-TCA at 12 ppb, and CCl_4 at 8.6 ppb

- GW-3, near central-west portion of the subject site - nitrate at 50 ppm, TCE at 480 ppb, PCE at 5.5 ppb, cis-1,2-DCE at 7.1 ppb, 1,1-DCE at 19 ppb, 1,1-DCA at 5.5 ppb, 1,1,1-TCA at 16 ppb, 1,2-DCA at 0.65 ppb, CCl_4 at 5.2 ppb, benzene at 0.57 ppb, toluene at 3.6 ppb, and xylenes at 2.5 ppb

The following concentrations were detected in December 1996 at the three monitoring wells located on the subject site:

- GW-1, near southeast corner of the subject site - nitrate at 20 ppb, TCE at 370 ppb, PCE at 8.3 ppb, cis-1,2-DCE at 8.3 ppb, 1,1-DCE at 18 ppb, 1,1-DCA at 6.5 ppb, 1,1,1-TCA at 18 ppb, CCl_4 at 2.7 ppb, and toluene at 3.7 ppb

- GW-2, near northwest corner of the subject site - nitrate at 38 ppm, TCE at 460 ppb, PCE at 4.5 ppb, cis-1,2-DCE at 2.5 ppb, 1,1-DCE at 23 ppb, 1,1-DCA at 2.3 ppb, 1,1,1-TCA at 19 ppb, CCl_4 at 8 ppb, and toluene at 1.6 ppb

- GW-3, near central-west portion of the subject site - nitrate at 30 ppm, TCE at 250 ppb, PCE at 6.2 ppb, cis-1,2-DCE at 7.1 ppb, 1,1-DCE at 11 ppb, 1,1-DCA at 3.7 ppb, 1,1,1-TCA at 9.1 ppb, 1,2-DCA at 0.51 ppb, CCl_4 at 2.6 ppb, and toluene at 2 ppb

Nitrate was detected at concentrations above the MCL in samples collected from subject site well GW-2 and GW-3 during the third quarter.

TCE was detected at concentrations above the MCL in subject site wells GW-1 and GW-3 in the third and fourth quarters of 1996. PCE was detected at concentrations above the MCL in onsite well GW-1 in the third quarter and in wells GW-1 and GW-3 in the fourth quarter. 1,1-DCE was detected at concentrations above the MCL in

onsite wells GW-1 through GW-3 in the third and fourth quarters. 1,1-DCA was detected at concentrations above the MCL in onsite well GW-3 in the third quarter and in onsite well GW-1 in the fourth quarter. 1,2-DCA was detected at concentrations above the MCL in onsite well GW-3 in the third and fourth quarters. Cis-1,2-DCE was detected at concentrations above the MCL in onsite wells GW-1 and GW-3 in the fourth quarter. CCl_4 concentrations were detected above the MCL in subject site wells GW-1 through GW-3 in the third and fourth quarters. All other samples collected from the subject site wells during the events associated with the third and fourth quarters had VOC concentrations below their respective MCLs.

TCE concentrations detected in wells GW-1 and GW-2 more than doubled from the October 1996 events to the December 1996 event, while the TCE concentration detected in samples obtained from subject site well GW-3 decreased by nearly half from the October 1996 event to the December 1996 event. Concentrations of PCE, cis-1,2-DCE and 1,1-DCA detected in wells GW-1 and GW-2 also nearly doubled from the October 1996 events to the December 1996 event. The concentrations of PCE and cis-1,2-DCE detected in samples obtained from well GW-3 increased slightly from the October 1996 event to the December 1996 event.

- ***Follow-up Investigative Report for Allied Signal North Hollywood Site*** prepared for ASA by EartTech, dated October, 1997

The follow-up investigation documented in this report involved off-site soil gas monitoring at the Kaiser Permanente property, removal of chromium-impacted soil hot spots to a depth of 10 feet bgs in the western parcel of the subject site, and collection and analysis of one groundwater monitoring sample from a groundwater monitoring well located downgradient of the chromium-impacted soil hot spot area. Analytical results of soil gas monitoring at the Kaiser Permanente property revealed that VOC concentrations in soil gas decreased sharply at all sample depths in the southern part of the property compared to the previous test conducted in 1995. VOC concentrations in soil gas samples collected from the northern part of the property remained at the same low levels as previously detected in 1995.

A total of 20 cubic yards of chromium-impacted soil was removed from seven 36-inch diameter borings drilled in the northwest quadrant of the subject site at previous soil boring locations SBP1-8, SBP1-36, SBP1-37, SBP1-73 and SBP1-73. Analytical results of soil samples collected from these previous borings identified concentrations of total chromium ranging from 583 to 1,700 mg/kg, and hexavalent chromium ranging from 28.6 to 170 mg/kg. Upon completing soil removal,

confirmatory soil samples were collected and analyzed for total and hexavalent chromium. Analytical results of the confirmatory samples indicated that maximum concentrations of total and hexavalent chromium were 2,280 and 37.5 mg/kg, respectively.

One groundwater sample and one duplicate groundwater sample were collected from onsite groundwater monitoring well GW-3 located southwest and downgradient of the chromium-impacted soil hot spot area. Analytical results indicated that total chromium was detected at a concentration of 1.4 mg/l in the primary sample while total and hexavalent chromium were detected at concentrations of 1.3 and 1.4 mg/l, respectively, in the duplicate sample. Hexavalent chromium was not detected above the laboratory detection limit of 2.0 mg/l in the primary sample.

Findings Regarding Current Environmental Condition at the Site

Based exclusively on a review of the above documents, varying degrees of soil and groundwater contamination remain on and beneath the subject site. Three categories of contaminants were identified – petroleum hydrocarbons, volatile organics, and chromium.

- **Petroleum Hydrocarbons** - TPH-impacted soil was excavated and treated. A PAL of 1,000 ppm and cleanup level of 100 ppm was approved by the RWQCB. Confirmation sampling in onsite impacted areas indicated soil with TPH concentrations above the PAL had been removed and remediated to the cleanup level established. Based on the RWQCB-approved PALs and cleanup levels, TPH-impacted soil with concentrations up to 100 ppm may remain onsite in those areas identified in the northwest, central-west, central, and central-east portion of the subject site, where TPH-impacted soils were identified.

- **Volatile Organics** - VOCs were detected in "very low to negligible" concentrations in shallow soil confirmation samples with the highest TPH concentrations, indicating that shallow soil containing VOCs in the areas of reported TPH-impacted soil were properly removed and remediated. All soil samples analyzed for VOC concentrations, as part of the TPH-impacted soil cleanup efforts, were found to contain less than 11 parts per billion (ppb) VOCs. However, the most recent soil gas monitoring (May 1996) results indicate TCE concentrations in deep onsite soil ranging from a low of 14.0 ppb at 100 feet to a high of 515 ppb at 200 feet.

  The most recent groundwater monitoring results (third and fourth quarters 1996) indicate PCE, TCE, 1,1-DCE, cis-1,2-DCE, 1,1-DCA, 1,2-DCA and CCl_4 were detected

at concentrations above their respective MCLs (5.0, 5.0, 6.0, 6.0, 5.0, 0.5 and 0.5 ppb). Over the course of groundwater monitoring events conducted at the subject site, concentrations of these contaminants have ranged from 0.58 to 8.3 ppb for PCE, 3.6 to 6,400 ppb for TCE, 0.5 to 59 ppb for 1,1-DCE, 0.26 to 160 ppb for cis-1,2-DCE, 0.2 to 51 ppb for 1,1-DCA, less than 0.5 to 0.65 ppb for 1,2-DCA, and 0.32 to 5.0 ppb for CCl^4. The December 1996 sampling detected PCE concentrations ranging from 2.6 to 5.5 ppb, TCE from 180 to 480 ppb, 1,1-DCE from 17 to 19 ppb, cis-1,2-DCE from 1.1 to 5.5 ppb, 1,1-DCA from 0.89 to 5.5 ppb, and CCl_4 from 4.0 to 8.6 ppb. VOC concentrations in groundwater appear to vary based on the fluctuating groundwater levels and transient nature of groundwater flow beneath the subject site.

- **Chromium** - Total and hexavalent chromium concentrations up to 1.4 ppm were detected in groundwater samples taken from groundwater monitoring well GW-3 located in the central-west portion of the subject site in July 1997. The MCL for total chromium in drinking water is 50 ppb. Residual concentrations of total and hexavalent chromium were reported up to 2,280 and 37.5 ppm, respectively, in the northwest part of the site where 20 cubic yards of chromium-impacted soil was removed in July 1997. US EPA Region 9 Preliminary Remediation Goals for total and hexavalent chromium in industrial soil are 450 ppm and 64 ppm, respectively. Hexavalent chromium concentrations exceeding the STLC (California hazardous waste criteria) of 5 ppm were detected in soil at a depth of 45 feet bgs in the central-west portion of the subject site. The approximately 20 cubic yards of chromium-impacted soil reported to have been removed is not expected to have addressed the levels of chromium detected up to 45 feet bgs. Significant levels of chromium appear to remain in soil and groundwater beneath the central-west portion of the subject site.

STUDY LIMITATIONS

This report describes the results of ENSR's review of available environmental documentation to determine the current environmental condition of the subject property. In the conduct of this review, ENSR has attempted to independently identify issues relating to the environmental conditions of the site within the limits of the established scope of work as described in our proposal. However, verification of potentially important facts was not always possible.

The historical information gathered was obtained from a review of documentation provided by Public Storage and ENSR document number 5555-298-832.

ENSR

This report was prepared by ENSR in accordance with the agreed upon scope of work. The statements, conclusions, and opinions contained in this report are only intended to give approximations of the environmental condition of the site. Moreover, there are several major modifications that are inherent in the conduct of this or any other environmental due diligence examination.

- First, it is difficult to predict which, if any of the potential environmental issues identified will become actual problems in the future, for federal and state environmental regulations continually change, as do the enforcement priorities of the applicable governmental agencies involved.

- Second, even for problems currently identified, it is often difficult and sometimes impossible to accurately estimate the liabilities that may be involved in remedying the problem(s), for the legal and technological standards for evaluating, remedying, and allocating liability for environmental issues are in a constant state of change. Moreover, the liability for remedying environmental problems tends to be highly dependent upon agency negotiations and the sometimes arbitrary and unpredictable nature of agency officials charged with such negotiations.

This report was prepared by ENSR for the benefit of its client, Public Storage, Inc. ENSR's client may release the information to third parties, who may use and rely upon the information at their discretion. However, any use of or reliance upon the information by a party other than specifically named above shall be solely at the risk of such third party and without legal recourse against ENSR, its parent, its subsidiaries and affiliates; or their respective employees, officers, or directors; regardless of whether the action in which recovery of damages is sought is based upon contract, tort (including the sole, concurrent, or other negligence and strict liability of ENSR), statute, or otherwise. This information shall not be used or relied upon by a party that does not agree to be bound by the above statement.

ENSR is pleased to be of service to Public Storage. If you have any questions regarding our report or findings, please feel free to call either of the undersigned at (805) 388-3775.

Sincerely,

Brenda Miller
Environmental Analyst

Jacqueline Breese
Manager, Environmental Management

SURVEYOR'S CERTIFICATE:

I HEREBY CERTIFY TO NORTH HOLLYWOOD ACQUISITION, LCC, AND CHICAGO TITLE INSURANCE THAT THE SURVEY PREPARED BY ME ENTITLED "ALTA SURVEY" WAS ACTUALLY MADE UPON THE GROUND AND THAT IT AND THE INFORMATION, COURSES AND DISTANCES SHOWN THEREON ARE CORRECT; THAT THE TITLE LINES AND LINES OF ACTUAL POSSESSION ARE THE SAME; THAT THE SIZE, LOCATION AND TYPE OF BUILDINGS AND IMPROVEMENTS (INCLUDING SQUARE FOOTAGE OF SAME) AS WELL AS THE DISTANCES TO THE BOUNDARY LINES OF THE PROPERTY ARE AS AS SHOWN AND ALL ARE WITHIN THE BOUNDARY LINES OF THE PROPERTY; THAT THE EXISTING ZONING, USE AND DENSITY CLASSIFICATIONS ARE "M2", "LIGHT INDUSTRIAL", NO DENSITY, AND THAT THE PROPERTY SURVEYED AND ALL EXISTING IMPROVEMENTS ON THE PROPERTY COMPLY WITH ALL RESTRICTIONS OF RECORD AND LAND USE REQUIREMENTS, INCLUDING, LIMITATIONS AND OTHER REQUIREMENTS OR RESTRICTIONS AS TO BUILDING HEIGHT AND LOCATION, BUILDING AND STRUCTURE COVERAGE AND DEPTH, SETBACKS AND SIDEYARDS AND ELEVATION OF OTHER PORTIONS OF THE IMPROVEMENTS, INCLUDING LOADING DOCKS; THAT THERE ARE NO EASEMENTS, USES OR ENCROACHMENTS FROM, OR UPON, OR AFFECTING THIS PROPERTY APPEARING FROM A CAREFUL PHYSICAL INSPECTION OF THE SAME, OTHER THAN THOSE SHOWN AND DEPICTED THEREON; THAT ALL UTILITY SERVICES REQUIRED FOR THE OPERATION OF THE PREMISES EITHER ENTER THE PREMISES THROUGH ADJOINING PUBLIC STREETS, OR THE SURVEY SHOWS THE POINT OF ENTRY AND LOCATION OF ANY UTILITIES WHICH PASS THROUGH OR ARE LOCATED ON ADJOINING PRIVATE LAND; THAT ANY UTILITY LINES AND APPURTENANCES AND UTILITY EASEMENTS SERVING THE PROPERTY AND ANY UTILITY TRANSFORMERS LOCATED ON THE PREMISES ARE DEPICTED HEREON AND THOSE TRANSFORMERS LABELED AS CONTAINING PCB'S ARE SPECIFICALLY NOTED; THAT THE SURVEY SHOWS THE LOCATION AND DIRECTION OF ALL STORM DRAINAGE SYSTEMS FOR THE COLLECTION AND DISPOSAL OF ALL ROOF AND SURFACE DRAINAGE; THAT ANY DISCHARGE INTO STREAMS, RIVERS OR OTHER CONVEYANCE SYSTEM IS SHOWN ON THE SURVEY AS WELL AS THE BENCH MARKS AND ELEVATIONS THEREOF; THE PARCEL NUMBERS AND/OR RECORDING INFORMATION OF THE SUBJECT PROPERTY AND THE ADJACENT PROPERTIES ARE SHOWN; THE PROPERTY SURVEYED IS NOT WITHIN ANY WETLANDS DESIGNATED ON ANY MAPS PREPARED BY THE U.S. ARMY CORPS OF ENGINEERS OR U.S. DEPARTMENT OF GAME AND WILDLIFE; THE SURVEYED PROPERTY AND ONLY THE SURVEYED PROPERTY CONSTITUTES ONE TAX LOT AND CONSTITUTES A SINGLE SUBDIVIDED LOT; ALL STREETS ADJACENT TO THE PROPERTY (INCLUDING THEIR CENTERLINES AND WIDTHS), RIGHT OF WAY LINES AND THE DISTANCE FROM THE NEAREST INTERSECTING STREETS ARE SHOWN; THE PROPERTY HAS PHYSICALLY UNRESTRICTED INGRESS AND EGRESS TO AND FROM SHERMAN WAY, AND SUCH STREET IS A PAVED, DEDICATED PUBLIC RIGHT OF WAY MAINTAINED BY THE CITY OF LOS ANGELES; THE NUMBER OF PARKING SPACES LOCATED ON THE PROPERTY IS ZERO WITH ZERO HANDICAPPED SPACES; EXCEPT AS SHOWN HEREON, THERE ARE NO DISCREPANCIES CONFLICTS, SHORTAGES IN AREA, PARTY WALLS, WALLS, DRIVEWAYS, FENCES, PIPELINES, UNDERGROUND STORAGE TANKS, RAILROAD TRACKS, SPUR TRACKS, SIDINGS, RUBBISH FILLS, SLOUGHS, SPRINGS, FILLED-IN WELLS OR CISTERNS, SEEP HOLES, STREAMS, CREEKS, SIGNS ADVERTISING THE PROPERTY, INCLUDING THOSE LOCATED OUTSIDE THE BOUNDARIES OF THE PROPERTY OR SET-BACK LINES; NO PORTION OF THE PROPERTY LIES WITHIN THE 100 YEAR FLOOD PLAIN, 100 YEAR FLOOD HAZARD AREA OR OTHER DESIGNATED SPECIAL FLOOD HAZARD AREA AS INDICATED BY THE MOST RECENT FEDERAL EMERGENCY MANAGEMENT AGENCY FLOOD INSURANCE RATE MAP, BEING COMMUNITY PANEL NO. 060137 DATED DECEMBER 12, 1980, AND THIS SURVEY IS MADE IN ACCORDANCE WITH THE MOST CURRENT "MINIMUM STANDARD DETAIL REQUIREMENTS FOR LAND TITLE SURVEYS" JOINTLY ESTABLISHED AND ADOPTED BY ALTA AND ACSM IN 1992 AND MEETS THE ACCURACY REQUIREMENTS OF AN URBAN SURVEY, AS DEFINED THEREIN, AND INCLUDES ITEMS 1-4 AND 6-11 AND 13 IN TABLE A CONTAINED THEREIN AND PURSUANT TO THE ACCURACY STANDARDS (AS ADOPTED BY ALTA AND ACSM AND IN EFFECT ON THE DATE OF THIS CERTIFICATION) OF AN URBAN SURVEY. THIS SURVEY HAS BEEN PREPARED IN CONNECTION WITH THAT CERTAIN TITLE COMMITMENT FOR TITLE INSURANCE DATED SEPTEMBER 10, 1997 ISSUED BY CHICAGO TITLE INSURANCE COMPANY, ORDER NO. 007135553, AND I CERTIFY THAT ALL MATTERS REFERENCED IN SUCH COMMITMENT ARE SHOWN ON THE SURVEY (OR IDENTIFIED ON THE FACE OF THE SURVEY AS NOT PLOTTABLE).

12-22-97
date

Glen C Aalbers
by

LICENSED LAND SURVEYOR · GLEN LEE AALBERS · STATE OF CALIFORNIA

SURVEYOR'S NOTES:

1. THE INFORMATION SHOWN HEREIN WAS GATHERED IN A FIELD SURVEY UNDERTAKEN IN SEPTEMBER, 1997 AT THE REQUEST OF PUBLIC STORAGE.
2. THIS MAP WAS PREPARED IN CONJUNCTION WITH A PRELIMINARY REPORT OF TITLE BY CHICAGO TITLE INSURANCE COMPANY REPORT NO. 007135553 DATED SEPTEMBER 10, 1997.
3. UTILITIES:

   THE UTILITIES EXISTING ON THE SURFACE AS SHOWN HAVE BEEN LOCATED BY A FIELD SURVEY. UNDERGROUND UTILITIES ARE INDICATED FROM RECORDS OF VARIOUS PRIVATE AND PUBLIC AGENCIES. THE SURVEYOR DOES NOT ACCEPT ANY RESPONSIBILITY FOR INDICATED LOCATIONS, CAPACITIES OR AVAILABILITY OF USE OF LACK OF SAID INFORMATION HEREON.
4. BASIS OF BEARINGS:

   THE BEARING OF "EAST" ON THE CENTER LINE OF SHERMAN WAY AS SHOWN ON PARCEL MAP L.A. NO. 7108, PER MAP FILED IN BOOK 265 PAGES 14 AND 15 OF PARCEL MAPS IN THE OFFICE OF THE COUNTY RECORDER OF LOS ANGELES COUNTY WAS USED AS THE BASIS OF BEARINGS.
5. AREA:

   156,021 SQ. FT.
   3.58 ACRES

EASEMENT NOTES:

(1) 20' WIDE PERMANENT EASEMENT FOR INSTALLING, CONSTRUCTING, PREPARING AND AND GRADING A SLOPE, TOGETHER WITH THE RIGHT OF ENTRY FROM TIME TO TIME AND AT ANY TIME TO MAKE EXCAVATIONS, EMBANKMENTS, CUTS AND SLOPES, AND PLACE EARTH AND FILL THEREON, AND TO MAINTAIN, REPAIR, IMPROVE AND RECONSTRUCT SUCH SLOPE ON THE EASEMENT AREA. SAID EASEMENT IS IN FAVOR OF HOME DEPOT AND IS PER DOCUMENT RECORDED MARCH 14, 1995 AS INSTRUMENT NO 95-382941 OF OFFICIAL RECORDS OF LOS ANGELES COUNTY.

EFFECT OF:

(A) A COVENANT AND AGREEMENT UPON SAID PROPERTY AND SUBJECT TO THE TERMS AND CONDITIONS THEREIN IN FAVOR OF THE CITY OF LOS ANGELES AS PER DOCUMENT RECORDED JULY 18, 1958 AS INSTRUMENT NO. 2007 OF OFFICIAL RECORDS OF LOS ANGELES COUNTY.

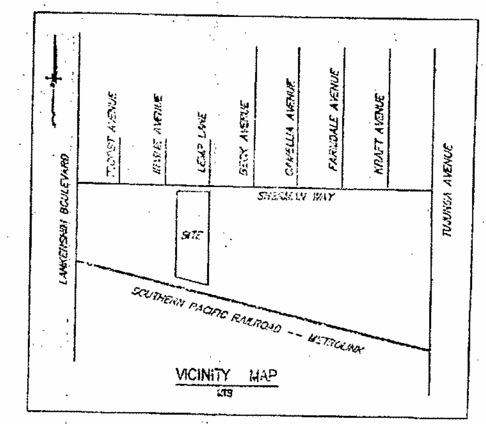
(B) A COVENANT AND AGREEMENT UPON SAID PROPERTY AND SUBJECT TO THE TERMS AND CONDITIONS THEREIN IN FAVOR OF THE CITY OF LOS ANGELES AS PER DOCUMENT RECORDED JULY 7, 1994 AS INSTRUMENT NO. 94-1280827 OF OFFICIAL RECORDS OF LOS ANGELES COUNTY.

(C) A COVENANT AND AGREEMENT UPON SAID PROPERTY AND SUBJECT TO THE TERMS AND CONDITIONS THEREIN IN FAVOR OF THE CITY OF LOS ANGELES AS PER DOCUMENT RECORDED JANUARY 20, 1995 AS INSTRUMENT NO. 95-109119 OF OFFICIAL RECORDS OF LOS ANGELES COUNTY.

(D) A COVENANT AND AGREEMENT UPON SAID PROPERTY AND SUBJECT TO THE TERMS AND CONDITIONS THEREIN IN FAVOR OF THE CITY OF LOS ANGELES AS PER DOCUMENT RECORDED FEBRUARY 6, 1995 AS INSTRUMENT NO. 95-201389 OF OFFICIAL RECORDS OF LOS ANGELES COUNTY.

(E) A COVENANT AND AGREEMENT UPON SAID PROPERTY AND SUBJECT TO THE TERMS AND CONDITIONS THEREIN IN FAVOR OF THE CITY OF LOS ANGELES AS PER DOCUMENT RECORDED FEBRUARY 6, 1995 AS INSTRUMENT NO. 95-201390 OF OFFICIAL RECORDS OF LOS ANGELES COUNTY.

(F) A COVENANT AND AGREEMENT UPON SAID PROPERTY AND SUBJECT TO THE TERMS AND CONDITIONS THEREIN IN FAVOR OF THE CITY OF LOS ANGELES AS PER DOCUMENT RECORDED FEBRUARY 6, 1995 AS INSTRUMENT NO. 95-201391 OF OFFICIAL RECORDS OF LOS ANGELES COUNTY.



VICINITY MAP
NTS

LEGAL DESCRIPTION:

ALL THAT PORTION OF PARCEL B OF PARCEL MAP NO. 2120, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP FILED IN BOOK 30 PAGE 86 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID PARCEL B, SAID CORNER BEING ON THE SOUTHERLY LINE OF SHERMAN WAY, 100.00 FEET WIDE; THENCE NORTH 90° 00' 00" EAST 239.20 FEET ALONG THE NORTH LINE OF SAID PARCEL B, TO THE WEST LINE OF PARCEL B OF PARCEL MAP L.A. NO. 7103, AS PER MAP FILED IN BOOK 267 PAGES 14 AND 15 OF PARCEL MAPS, RECORDS OF LOS ANGELES COUNTY; THENCE SOUTH 00° 00' 09" WEST 684.52 FEET ALONG SAID WEST LINE TO THE NORTH LINE OF THE SOUTHERN PACIFIC RAILROAD RIGHT OF WAY, 100.00 FEET WIDE, AS SHOWN ON SAID PARCEL MAP; THENCE NORTH 76° 37' 12" WEST 244.50 FEET TO THE EAST LINE OF PARCEL A OF SAID PARCEL MAP L.A. NO. 2120; THENCE NORTH 00° 01' 41" WEST 627.94 FEET ALONG SAID EAST LINE TO THE POINT OF BEGINNING.

No.	REVISION DESCRIPTION	BY	DATE
1	Add legend & revise legal desc	dss	10-17 1997
2	Revise dwg & cert.	GLA	12-22 1997

ALTA SURVEY
PUBLIC STORAGE
CITY OF LOS ANGELES

AALBERS SURVEY & MAPPING
LAND PLANNING • ENGINEERING • SURVEYING
2698 MATARO STREET, PASADENA, CA. 91107
Phone : (818) 683-0430, Fax : (818) 683-9058

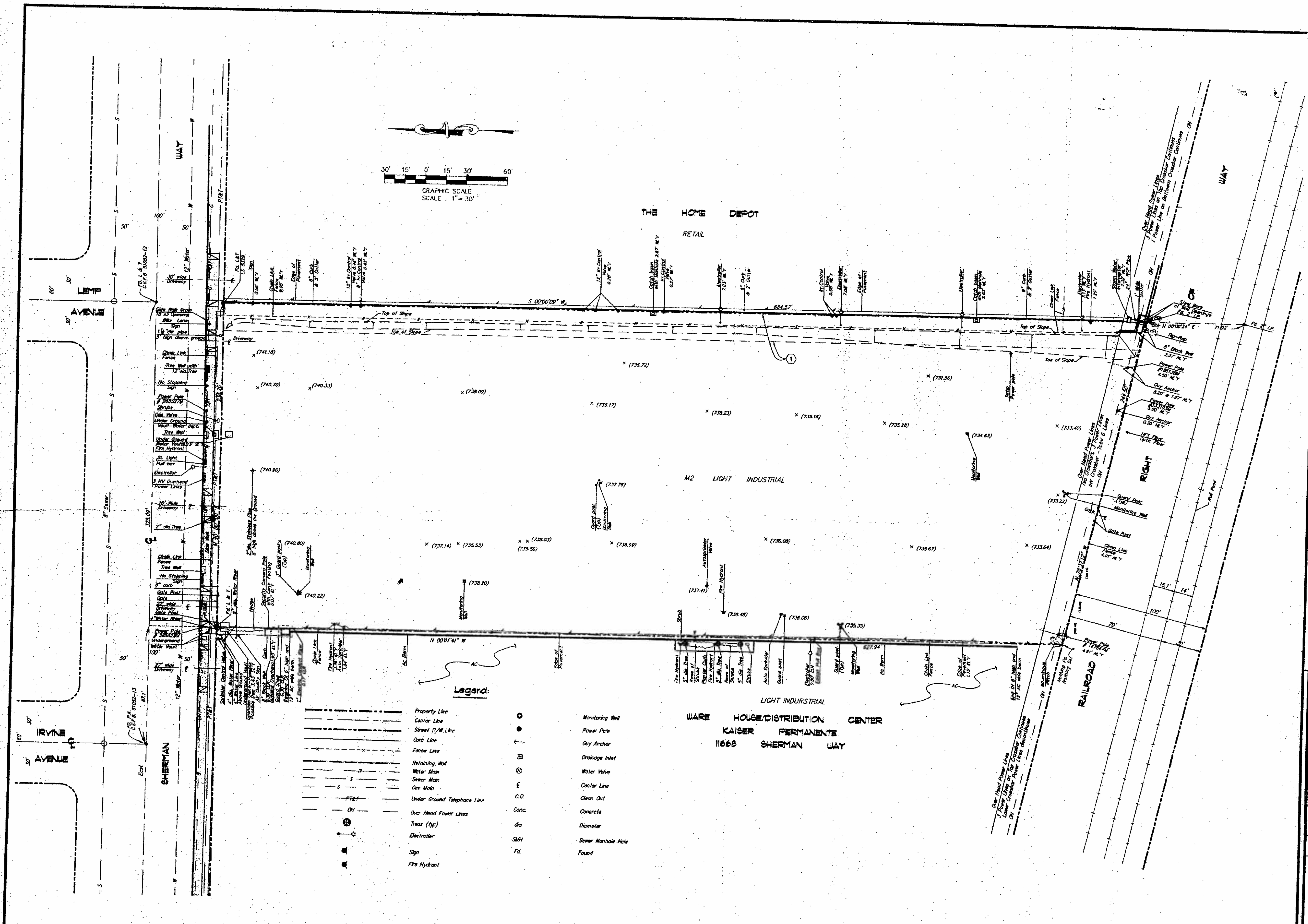
DESIGNED:	GLA
DRAWN:	DSS
CHECKED:	GLA
SUPERVISED:	GLA
PROJ. ENGINEER:	
DATE:	10/1/97
SCALE:	1"=30'
JOB NUMBER:	97007

LICENSED LAND SURVEYOR · GLEN L. AALBERS · No. 4494 · Exp. 9-30-98 · STATE OF CALIFORNIA

Glen C Aalbers
GLEN L. AALBERS
PLS 4494
12/22/97
DATE

SHEET NO.
1
OF 2 SHEETS

P.S.# 97420 (99830) N. Hollywood, CA (#3)



No	REVISION DESCRIPTION	BY	DATE
1	Add legend & chg legal desc.		
2	Revise dim of cert.		

A.L.T.A. SURVEY
PUBLIC STORAGE
CITY OF LOS ANGELES

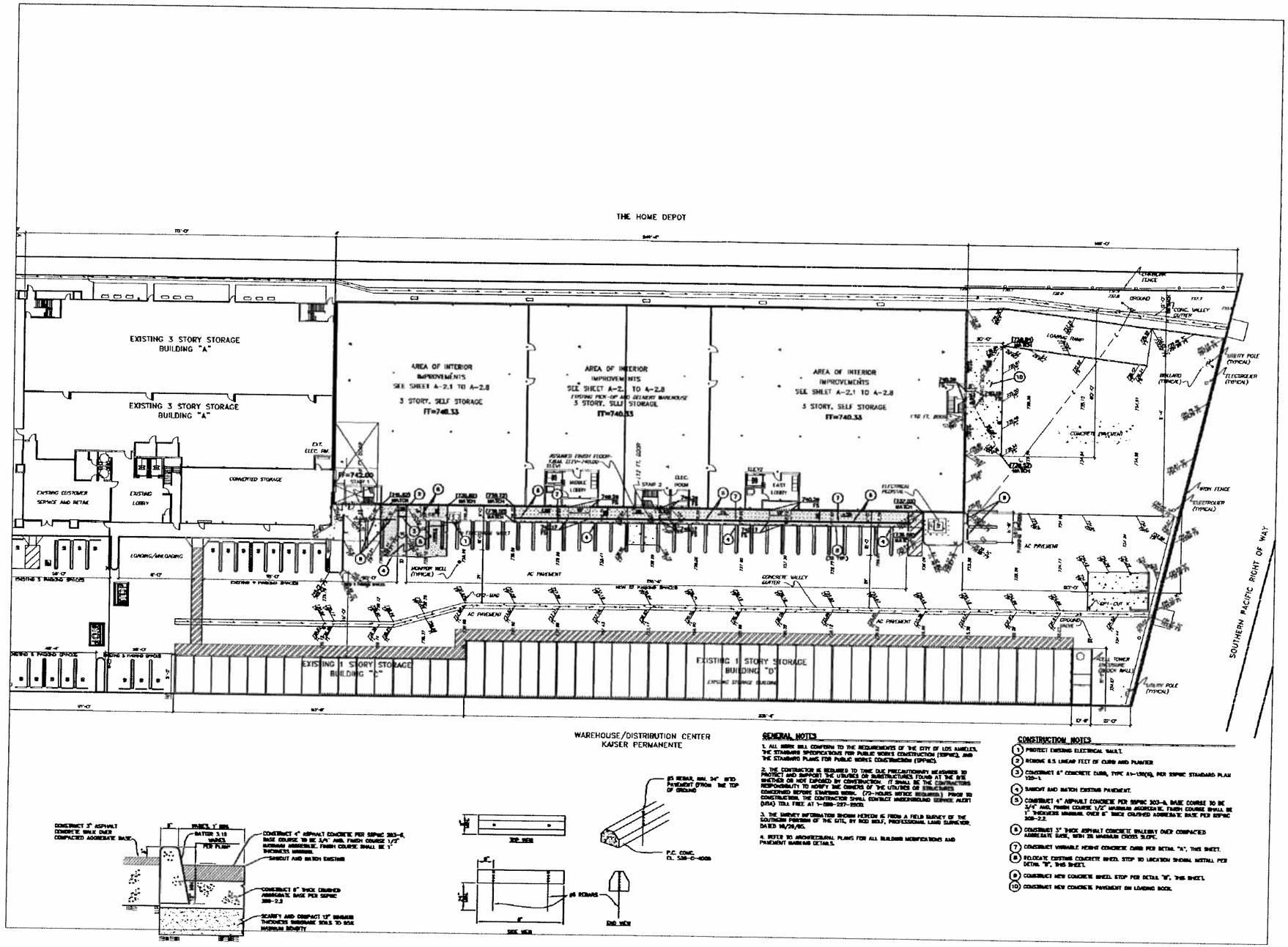
AALBERS SURVEY & MAPPING
LAND PLANNING • ENGINEERING • SURVEYING
2698 MATARO STREET, PASADENA, CA. 91107
Phone : (818) 683-0430, Fax : (818) 683-9058

DESIGNED:	GLA
DRAWN:	DSS
CHECKED:	GLA
SUPERVISED:	GLA
PROJ. ENGINEER	
DATE:	10/1/97
SCALE:	1" = 30'
JOB NUMBER:	97007

LICENSED LAND SURVEYOR
GLEN L. AALBERS
No. 4494
Exp. 9-30-98
STATE OF CALIFORNIA

GLEN L. AALBERS
PLS 4494
12-22-97
DATE

SHEET NO.
2
OF 2 SHEETS



GENERAL NOTES

1. ALL WORK WILL CONFORM TO THE REQUIREMENTS OF THE CITY OF LOS ANGELES, THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION (SSPWC), AND THE STANDARD PLANS FOR PUBLIC WORKS CONSTRUCTION (SPPWC).
2. THE CONTRACTOR IS REQUIRED TO TAKE DUE PRECAUTIONARY MEASURES TO PROTECT AND SUPPORT THE UTILITIES OR SUBSTRUCTURES FOUND AT THE SITE, WHETHER OR NOT EXPOSED BY CONSTRUCTION. IT SHALL BE THE CONTRACTORS RESPONSIBILITY TO NOTIFY THE OWNERS OF THE UTILITIES OR STRUCTURES CONCERNED BEFORE STARTING WORK. (72-HOURS NOTICE REQUIRED.) PRIOR TO CONSTRUCTION, THE CONTRACTOR SHALL CONTACT UNDERGROUND SERVICE ALERT (USA) TOLL FREE AT 1-800-227-2600.
3. THE SURVEY INFORMATION SHOWN HEREON IS FROM A FIELD SURVEY OF THE SOUTHERN PORTIONS OF THE SITE, BY ROD WOLF, PROFESSIONAL LAND SURVEYOR, DATED 10/26/05.
4. REFER TO ARCHITECTURAL PLANS FOR ALL BUILDING MODIFICATIONS AND PAVEMENT MARKING DETAILS.

CONSTRUCTION NOTES

1. PROTECT EXISTING ELECTRICAL VAULT.
2. REMOVE 6.5 LINEAR FEET OF CURB AND PLANTER
3. CONSTRUCT 6" CONCRETE CURB, TYPE A1-150(6), PER SSPWC STANDARD PLAN 120-1.
4. SAWCUT AND MATCH EXISTING PAVEMENT.
5. CONSTRUCT 4" ASPHALT CONCRETE PER SSPWC 203-A, BASE COURSE TO BE 3/4" MAX., FINISH COURSE 1/2" MINIMUM AGGREGATE, FINISH COURSE SHALL BE 1" THICKNESS MINIMUM, OVER 6" THICK CRUSHED AGGREGATE BASE PER SSPWC 200-2.2.
6. CONSTRUCT 3" THICK ASPHALT CONCRETE WALKWAY OVER COMPACTED AGGREGATE BASE, WITH 2% MINIMUM CROSS SLOPE.
7. CONSTRUCT VARIABLE HEIGHT CONCRETE CURB PER DETAIL "A", THIS SHEET.
8. RELOCATE EXISTING CONCRETE WHEEL STOP TO LOCATION SHOWN. INSTALL PER DETAIL "B", THIS SHEET.
9. CONSTRUCT NEW CONCRETE WHEEL STOP PER DETAIL "B", THIS SHEET.
10. CONSTRUCT NEW CONCRETE PAVEMENT ON LOADING DOCK.

VARIABLE HEIGHT CURB (A)

CONCRETE WHEEL STOP (B)

Grading and Paving Plan

1" = 20'-0" | 01

James Goodman Architecture
31732 Rancho Viejo Road, Suite E
San Juan Capistrano, California 92675
949.488.8788 Voice
949.488.8819 Fax
Member American Institute of Architects
An Architectural Corporation

Penfield & Smith
Civil Engineers
101 East Victoria Street
Santa Barbara, California 93101
805.963.9532 Voice
805.966.9811 Fax

Interior Improvements for

Public Storage

11620 Sherman Way
North Hollywood, California

Public Storage, Inc.
701 Western Avenue
Glendale, California 91201
818.244.8080 Voice
818.552.7040 Fax

Project Number
Drawing Number
Issue Dates
Bid Set Submittal - October 31, 2005

Grading and Paving Plan
C-1.1

Cal/EPA

Los Angeles Regional Water Quality Control Board

101 Centre Plaza Drive
Monterey Park, CA
91754-2156
(213) 266-7500
FAX (213) 266-7600

PSI Document 34.1

Pete Wilson
Governor

August 26, 1997

Benny Dehghi, Remediation Manager
Health, Safety & Environmental Group
Allied Signal Inc.
Aerospace Equipment System
2525 W. 190th. Street
Torrance, CA 90504-6099

CLOSURE FOR THE EASTERN PORTION OF ALLIED SIGNAL PROPERTY, 11600 SHERMAN WAY, NORTH HOLLYWOOD (FILE No. 111.0180)

We are in receipt of the "Site Closure Letter Report" dated April 25, 1997. This submission presents assessment and remediation results and proposes closure of the eastern portion of the site. According to our records, ownership of the subject portion of the site has been transferred and the site has been occupied by a Home Depot retail store since 1995.

Laboratory analysis of soil matrix samples collected during numerous phases of assessment on the subject portion of the site detected maximum concentrations 200 µg/kg PCE (at 1' bgs), 180 µg/kg 1,1,1-TCA (at 1' bgs) and relatively minor concentrations of other VOCs, MEK, acetone and BTEX. Soil vapor samples collected at shallow depths at the site contained maximum concentrations of 46 µg/l 1,1,1-TCA (at 20' bgs), 15 µg/l TCE (at 5' bgs), 92 µg/l PCE (at 5' bgs) and 86 µg/l 1,1,-DCE (at 5' bgs). Soil vapor samples collected from multi-depth probes at 100', 150' and 200' bgs contained maximum contamination of 36 µg/l 1,1-DCE at 150' bgs (28 µg/l at 200' bgs), 45 µg/l 1,1,1-TCA at 100' bgs (29 µg/l at 200' bgs), 3 µg/l PCE at 200' bgs, and 88 µg/l TCE at 200' bgs. Ground water is approximately 220' bgs. Closure for total petroleum hydrocarbon (TPH) contaminated soil on the subject site was granted in our letter of March 8, 1995.

Based on information submitted and our inspections, we have no further requirements with respect to the Well Investigation Program (WIP) for the subject portion of the site. The remaining soil contamination is not a substantial threat to ground water quality and therefore further remediation is unwarranted. This closure is only for the subject eastern portion of the site and does not apply to the portion of the subject site that is currently occupied by Kaiser Permanente, where outstanding assessment requirements have not yet been addressed.

The jurisdiction requirements of other agencies, such as the U.S. Environmental Agency (USEPA), are not affected by the Board's "no further requirements" determination. Such agencies may choose to make their own determination concerning the site.

Please contact Walter Salas at (213) 266-7542 if you have any questions, and address all correspondence to his attention.

Eric Nupen, R.G.
Senior Engineering Geologist

cc: Lance Richman, USEPA Region IX, San Francisco
Mal Blevins, ULARA Watermaster

California Regional Water Quality Control Board

Los Angeles Region

Winston H. Hickox
Secretary for Environmental Protection

320 West 4th Street, Suite #200, California 9013
Phone (213) 576-6600 FAX (213) 576-6640
Internet Address: http://www.swrcb.ca.gov~rwqcb4

Gray Davis
Governor

RECEIVED 1-13-00

January 10, 2000

North Hollywood Acquisition LLC
P. O. Box 25050
Glendale, CA 91201-5035

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
CLAIM NO. Z 415 467 954

PSI Document 34.2

METHYL TERTIARY BUTYL ETHER (MTBE) POLLUTION INVESTIGATION OF THE LOS ANGELES DEPARTMENT OF WATER AND POWER, NORTH HOLLYWOOD WELL NO. 17 (File No. 99-62)
11600 Sherman Way, North Hollywood, CA (Case No. 111.0180)

Dear Sir/Madam,

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) in conjunction with the City of Los Angeles Fire Department requests that you provide information to assist with the investigation of methyl tertiary butyl ether (MTBE) pollution of Los Angeles Department of Water and Power's (LADWP) North Hollywood Well No. 17. This Regional Board is the public agency with the primary responsibility for the protection of ground and surface water quality for all beneficial uses within Coastal Los Angeles and Ventura Counties, including the regulation of leaking underground storage tanks. In some cases, the City of Los Angeles Fire Department is the Local Implementing Agency (LIA) in charge of regulating underground storage tanks systems.

The LADWP has reported to the State of California Department of Health Services that their N. Hollywood Well No. 17 (NHW 17) had detected the gasoline additive MTBE. Analytical testing data from NHW 17 reported concentrations of MTBE up to 3.5 µg/L. This well has been reported by LADWP to be standby well that was used sporadically. An interim Action Level of 13µg/L for MTBE has been established by the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment. The State Department of Health Services (DHS) Environment Management and Engineering Department adopted a secondary drinking water standard of 5 µg/L for MTBE, effective January 7, 1999. The MTBE concentration in the NHW 17 is below the interim action level.

As you know, MTBE has been used since the late 1970's as an octane booster in gasoline. More recently, MTBE is being used to reformulate gasoline in order to reduce potential hazardous air emissions resulting from the use of gasoline. As opposed to other typical gasoline constituents, MTBE is highly soluble in water, very mobile through soil and groundwater, has negligible natural biodegradation in the environment, and is difficult and more costly to treat at the wellhead. As you may know, Governor Grey Davis signed Executive Order No. D-5-99. In part, the Governor's Order is seeking the phase out of MTBE containing gasoline in California. In addition, the Governor's Executive Order requires that the Regional Board redirect its limited resources to the area that are vulnerable to MTBE impacts. The Regional Board has determined that the LACDWP North Hollywood well field is susceptible to MTBE pollution due to hydrogeologic conditions, density of gasoline underground storage tanks within one mile radius from the North Hollywood well field, the persistence of MTBE, as well as the fate and transport of MTBE in the subsurface environment.

This Regional Board has initiated an investigation to identify the source(s) of MTBE pollution potentially impacting LADWP's NHW 17. Potential sources of MTBE pollution have been identified within an approximate one mile radius of NHW 17. Please see attached Table 1 for site information and Figure 1 for underground storage tank sites and LACDWP's NHW 17 locations. Based upon a survey of the area surrounding NHW 17, at least one site owned by your business or agency has currently or had underground fuel storage tanks within approximately one mile radius from the impacted well. As a potential responsible party, you are required to provide a technical report detailing underground storage tank operations at your site. Based upon the technical report information, you may be required to conduct additional soils and/or groundwater investigations to determine whether your business activities are a contributing source of the MTBE pollution impacting LADWP's NHW 17.

Pursuant to Section 13267 (b) of the California Water Code, you are hereby directed to submit to this Regional Board by **February 10, 2000**, a technical report as outlined below in the attached Appendix A – Los Angeles Department of Water and Power North Hollywood Well No. 17 Methyl Tertiary Butyl Ether Pollution Investigation.

We look forward to working with you to resolve the MTBE pollution problem currently affecting LADWP's NHW 17. We will be contacting all of the potential source sites identified in Table 1 at some point in the investigation phase. If you have any questions regarding the information required above please contact Mr. David A. Bacharowski at (213) 576-6620, or Hubert Kang at (213) 576-6695.

Sincerely,

DENNIS A. DICKERSON
Executive Officer

Enclosures:
1) Appendix A – Methyl Tertiary Butyl Ether Pollution Investigation of the Los Angeles Water and Power North Hollywood Well No.17
2) Table 1 – Potential MTBE Sources within One Mile Radius of North Hollywood Well No.17
3) Site Location Map

cc: Regional Board Members
Winston Hickox, Office of Environmental Protection, California Environmental Protection Agency
Penny McDaniel, US Environmental Protection Agency, Region 9
Walt Pettit, Executive Director, State Water Resources Control Board
Jorge Leon, Office of Chief Counsel, State Water Resources Control Board
David Spath, Division of Drinking Water and Environmental Management, State Department of Health Services
Gary Yamamoto, Drinking Water Field Operations Branch, State Department of Health Services
Melvin Blevins, ULARA Watermaster
Pankaj Parekh, City of Los Angeles, Department of Water and Power
Captain Dennis Wilcox, City of Los Angeles Fire Department

Appendix A
Methyl Tertiary Butyl Ether Pollution Investigation of the Los Angeles Department of Water and Power North Hollywood Well No. 17

1. Underground Diesel or Waste Oil Storage Tanks

   A. If your site, or any other site owned and/or operated by your business within an approximate one mile radius of the North Hollywood Well No. 17, as shown on Figure 1, has stored only diesel or waste oils in any underground tank since 1990, please so state and provide supporting documents (i.e., UST operating permits, tank removal records, subsurface investigation testing results, waste disposal manifests and records, etc.) and there is no need to proceed any further with providing the information required below. The information provided will be evaluated and a determination made regarding the need to perform soil and/or groundwater investigation.

2. Underground Gasoline Storage Tanks

   A. Identify any current and former underground gasoline storage tanks owned or operated by your business or agency within one mile from the North Hollywood Well No. 17 that are not shown on the attached Table 1 or Figure 1.

   B. Provide for each underground gasoline storage tank, the location(s), capacity, materials of construction, and date(s) of installation and removal. Provide a scaled map of each underground storage tank site identifying the tank(s) location, associated pipelines, dispenser pumps, and vent pipelines location.

   C. Has a contaminant release occurred from USTs at the site?

   D. Is there soil and/or groundwater contamination beneath the site?

   E. Provide a detailed, yet concise summary of any soils and/or groundwater investigation(s) completed to assess gasoline storage tanks owned and/or operated by your business or agency within one mile of North Hollywood Well No. 17.

   F. Provide copies of all site assessment and/or monitoring reports generated for the site.

   G. Provide copies of all gas chromatographs for laboratory testing completed for aromatic hydrocarbons (EPA Methods 8020, 8021, or 8260A/B) that are available from analyses for all on- and off-site soil and/or groundwater samples at each location for the past 7 years. If necessary, you may need to contact the laboratory that conducted the analyses for copies.

   H. Provide the name, mailing address, and telephone number for all recorded fee title holders for the subject site.

3. Methyl Tertiary Butyl Ether (MTBE)

A. Provide a detailed complete history of MTBE usage by your business since January 1, 1980. Please describe the history of each site use.

B. Provide a maintenance history of the facilities storing/transporting MTBE for each site. Have USTs and/or associated piping and/or dispensers been integrity tested tight, and when were piping/dispensers upgraded (if applicable). Provide copies of all tank and pipline integrity tests results.

C. Have soil samples and/or groundwater samples ever been analyzed for MTBE and if so,

a. Has MTBE been detected in soil and/or groundwater beneath the site?

b. Has the extent of MTBE contaminants in soil and/or groundwater been delineated vertically and horizontally?

c. Please provide MTBE analyses for soil and/or groundwater samples collected in your most recent sampling event(s), if applicable.

d. Provide information available to your business on potential effects of MTBE discharge to the environment, its impacts on surface waters, and of particular concern for this investigation, the impacts of MTBE on groundwater resources utilized as municipal and/or domestic water supplies.

Table 1. Potential MTBE Sources Within One Mile Radius Of North Hollywood Well No.17

Site No.	File No.	Site Name	Site Address	City	Status*
1	111.0180	Bendix Corp/Allied Signal	11600 Sherman Way	North Hollywood	R, S, 7, Solvents
2		Valhalla Properties	10621 Victory Blvd.	North Hollywood	L (City of Los Angeles), No file records
3		Sarkis Krikorian Leons Co.	10740 Vanowen St.	North Hollywood	L (City of Los Angeles), U, Gasoline
4		Costco Gasoline	10950 Sherman Way	Sun Valley	Sighted during field survey
5	916060152	Chevron #9-202034	11000 Victory Blvd.	North Hollywood	L (City of Los Angeles), S, 9, Gasoline
6	111.2243	Greg's Automotive	11041 Vanowen St.	North Hollywood	R, O, 9, Coolant
7	916061625	Fast Fuel Facility(Former)	11051 Victory Blvd.	North Hollywood	R, A, 7, Gasoline
8	913522416	Hawker Pacific	11310 Sherman Way	Sun Valley	L (City of Los Angeles), U, 3A, Hydrocarbons
9		Unocal 76	11705 Victory Blvd.	North Hollywood	L (City of Los Angeles), U, Gasoline
10		U-Haul Center	11666 Victory Blvd.	North Hollywood	L (City of Los Angeles), U, Gasoline
11		N&K Auto Center-Shell Sat.	11680 Victory Blvd.	North Hollywood	L (City of Los Angeles), U, Gasoline
12		Shell Service Station	5957 Vineland Ave.	North Hollywood	L (City of Los Angeles), U, Gasoline
13	916010052	Unocal #3654	5958 Vineland Ave.	North Hollywood	L (City of Los Angeles), S, 9, Gasoline
14		E-Z Smog	6000 Vineland Ave.	North Hollywood	Sighted during field survey
15	916061616	Sevan Auto Service	6050 Vineland Ave.	North Hollywood	L (City of Los Angeles), U, 9, Gasoline
16		Lankershim Car Wash	6622 Lankershim Blvd.	North Hollywood	L (City of Los Angeles), U, Gasoline
17		Royal Boham's Automotive	6761 Vineland Ave.	North Hollywood	L (City of Los Angeles), U, Diesel
18	916000016	Thrifty #016	6800 Lankershim Blvd.	Los Angeles	L (City of Los Angeles), O, 9, Gasoline
19		ARCO #222	6804 Vineland Ave.	North Hollywood	L (City of Los Angeles), U, Gasoline
20		Gerrald Wax	6858 Beck Ave.	North Hollywood	L (City of Los Angeles), U, Wax
21		Laidlaw Transit	6950 Tujunga Ave.	North Hollywood	L (City of Los Angeles), U, Gasoline
22		Terry Lumber Co.	7151 Lankershim Blvd.	North Hollywood	L (City of Los Angeles), U, Gasoline
23	913522434	Tosco S.S. #3547	7209 Vineland Ave.	Sun Valley	L (City of Los Angeles), S, 0, Gasoline
24	913521843	Sun Valley Junior High School	7330 Bakman Ave.	Sun Valley	R, O, 9, Diesel
25		Sid Zabounian	7559 Vineland Ave.	Sun Valley	L (City of Los Angeles), U, Gasoline
26		Pacific West Management	11428 Sherman Way	North Hollywood	L (City of Los Angeles), U, Gasoline
27		Kaiser Permanente	11668 Sherman Way	North Hollywood	L (City of Los Angeles), U, Gasoline

* Abbreviations for Status Column

Lead Agency Codes:

L	Local Agency Lead
R	Regional Board Lead

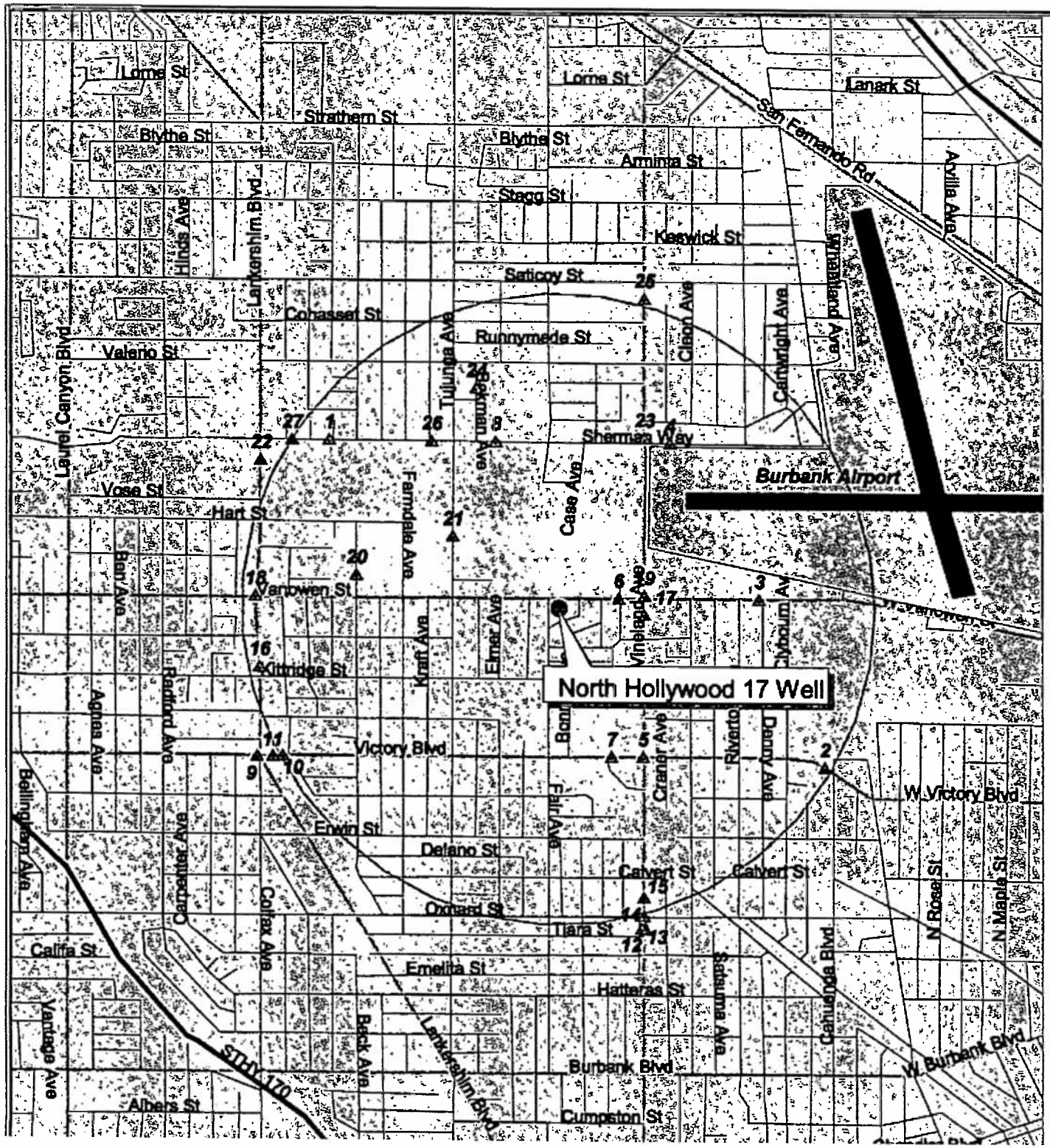
Case Type Codes:

U	Undefined
S	Soil
O	Groundwater
A	Specific tank leak that has contaminated an aquifer used for driking water

Status Codes:

0	No action
1	Lead being confirmed
3A	Preliminary site assessment workplan submitted
3B	Preliminary site assessment underway
5C	Pollution characterization
5R	Remediation plan
7	Remedial action
8	Post remedial action monitoring
9	Case closed

LUSTIS: Regional Board's Leaking Underground Storage Tanks Information System.



LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD

UST SITES WITHIN 1 MILE OF NORTH HOLLYWOOD 17 WELL

Map No	Facility Name
1	Bendix/ Allied Signal
2	Valhalla Prop
3	Sarkis Krikorian Leons Co.
4	Costco Gasoline
5	Chevron #9-202034
6	Greg's Automotive
7	Fast Fuel Facility(FORMER)
8	Hawker Pacific
9	Unocal 76
10	U-Haul Center
11	N & K Auto Center
12	Shell Service Station
13	Unocal #3654
14	E-Z Smog
15	Quick Smog & Auto
16	Lankershim Car Wash
17	Royal Boham's Automotive
18	Thrifty #016
19	ARCO #222
20	Gerrald Wax
21	Laidlaw Transit
22	Terry Lumber Co.
23	Tosco S.S. #3547
24	Sun Valley Junior High Sch
25	Sid Zabounian
26	Pacific West Management
27	Kaiser Permanente

Notes: North Hollywood-17 Perforations (ft.): 145-185, 230-273, 287-406

0 0.25 0.5 0.75 1 Miles

California Regional Water Quality Control Board

Los Angeles Region

Over 50 Years Serving Coastal Los Angeles and Ventura Counties

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

320 W. 4th Street, Suite 200, Los Angeles, California 90013

Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.swrcb.ca.gov/rwqcb4

Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

PSI Document 34.3

February 21, 2003

Mr. Benny DeHghi
Manager, Remediation
Honeywell International Incorporated
2525 West 190th Street
Torrance, CA 90504-6099

Certified Mail
Return Receipt Requested
Claim No. 7002-0860-0001-0651-0879

CLEANUP AND ABATEMENT ORDER NO. R4-2003-0037 FOR HONEYWELL INTERNATIONAL INC. (FORMERLY ALLIED SIGNAL INC.), 11600 SHERMAN WAY, NORTH HOLLYWOOD, CALIFORNIA (FILE NO. 111.0180)

Dear Mr. DeHghi:

Enclosed is Cleanup and Abatement Order No. R4-2003-0037 (Order) directing Honeywell International Inc. (Discharger) formerly Allied Signal Inc. to assess, cleanup and abate the effects of contamination discharged to soil and groundwater at the facility identified above. This Order is issued under authority of section 13304 of the California Water Code. Should the Discharger fail to comply with any provision of this Order, it may be subject to further enforcement action, including but not limited to injunction and civil monetary remedies pursuant to California Water Code sections 13304, 13308, and 13350.

Pursuant to California Water Code section 13320, the Discharger may seek review of this Order by filing a petition for review with the State Water Resources Control Board (State Board). Such a petition must be received by the State Board at address P.O. Box 100, 1001 I Street, Sacramento, California 95814, within 30 days of the date of this Order.

Should you have questions or wish to discuss details, please contact Mr. Dixon Oriola at (213) 576-6803 or Mr. Mohammad Zaidi at (213) 576-6732.

Sincerely,

Dennis A. Dickerson
Executive Officer

Enclosure

cc: See next page

ORIGINAL

cc: Robert Sams, State Water Resources Control Board, Office of Chief Counsel
Michael Lauffer, State Water Resources Control Board, Office of Chief Counsel
Sayareh Amirebrahimi, State Department of Toxic Substances Control, Glendale Office
Vera Melnyk-Vecchio, State Department of Health Services, Drinking Water Field Operations Branch
David Stensby, US Environmental Protection Agency
Bob Fitzgerald, US Environmental Protection Agency
Mel Blevins, Upper Los Angeles River Area Watermaster
Donald R. Froelich, City of Glendale
Richard F. Harasick, City of Los Angeles Department of Water and Power
Ernest F. Wong, City of Los Angeles Department of Water and Power
Fred Lantz, City of Burbank
John Sambuco, Public Storage, Laguna Hills, California
Scott Sobeck, Home Depot, Orange California
Helen Ku, Kaiser Permanente, Pasadena, California

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION

Cleanup & Abatement Order No. R4-2003-0037
Requiring
HONEYWELL INTERNATIONAL, INC.
(FORMERLY ALLIED SIGNAL, INC.)
To
Assess, Cleanup and Abate the Effects of Contaminants Discharged to Soil and Groundwater

(FILE NO. 111.0180)

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) herein finds that:

BACKGROUND

1. **San Fernando Basin:** The alluvial basin underlying the San Fernando Valley, known as the San Fernando Basin, is an important source of groundwater, providing drinking water to over 1 million residents in the Los Angeles Region. As set forth in the ***Water Quality Control Plan for the Los Angeles Region (Basin Plan)*** adopted on June 13, 1994, the Regional Board has designated beneficial uses for groundwater in the San Fernando Basin (among which are municipal and domestic drinking water supplies), and has established water quality objectives for the protection of those beneficial uses.

2. **Water Quality in the San Fernando Basin:** Volatile organic compounds (VOCs) which are harmful to human health were first discovered in a San Fernando Basin well in 1979. Since then, all City of Burbank wells pumping groundwater for drinking water purposes have been impaired by VOC contamination. In 1986, the US Environmental Protection Agency (USEPA) placed four areas of groundwater contamination and adjacent areas where contamination has (or may have) migrated as one large site called the San Fernando Valley Superfund Site on the National Priorities List[1], pursuant to section 105 of CERCLA, 42 USC §9605. USEPA has divided the San Fernando Valley Superfund Site into five operable units (OUs). Each OU represents an interim containment remedy currently in progress in the eastern San Fernando Valley. Honeywell International Inc. is responsible for a site (Former Allied Signal Inc. Site) located within the North Hollywood Operable Unit (NHOU).

   Information that has become recently available to the Regional Board demonstrates that some of the groundwater supply wells in the San Fernando Valley Groundwater Basin have been impacted by heavy metals, such as chromium. Chromium concentrations exceed current safe drinking water standards at some locations in the San Fernando Valley and chromium threatens the drinking water resource of the basin. The Maximum Contaminant Level (MCL) for total chromium in California drinking water is 50 parts per billion (ppb). As a result, the Regional Board is currently investigating potential sources of chromium contamination.

[1] List of contaminated sites that pose a threat to human health and/or the environment, and are prioritized by USEPA and the public in terms of their relative risk to human health and/or the environment.

3. **Discharger Responsibilities:** Honeywell International Inc., (hereinafter Discharger) has been named a responsible party by USEPA. The Discharger's Site has been found by the Regional Board to be contaminated with chlorinated solvents, petroleum hydrocarbons and heavy metals including chromium. The primary pollutants under investigation within the NHOU are chlorinated organic solvents.

4. **Location:** The Discharge's site (Site) is located at 11600 Sherman Way, North Hollywood, California (Attachment A: Figures 1 and 2). Sherman Way binds the property on the north on the south by Southern Pacific Railroad, on the east by Tujunga Avenue and on the west by Lankershim Boulevard. As detailed in the findings below, the Discharger's activities at the Site have caused the release of waste to the subsurface resulting in soil contamination and impairment of groundwater resources in the NHOU.

SITE HISTORY

5. **Site Activities:** From 1941 to 1983, the Site was owned and operated by Bendix Corporation. Allied Corporation acquired Bendix Corporation in 1983. In 1985, Allied Corporation combined with Signal Companies to form Allied Signal Inc. The principal operations at the Site were manufacturing of hydraulic and pneumatic valves, painting and plating processes. The operation remained the same until Allied Signal Inc. ceased operations in 1992. The Site buildings were razed in 1993. The property has since been subdivided and redeveloped into three separate parcels. In 1995, the western-most parcel was sold to Kaiser Permanente (Kaiser Property) and the middle property, referred to as Western Parcel, was sold to Public Storage Inc. The eastern-most parcel (Eastern Parcel) was sold to Home Depot in 1997. In 1999, Allied Signal Inc., merged with Honeywell, Inc., and became known as Honeywell International Inc.

   During normal business operations, the Discharger generated hazardous waste and released petroleum hydrocarbons, chlorinated organic compounds and heavy metals to the soil and groundwater. These findings are based on Regional Board investigative findings, and subsurface investigations performed by the Discharger.

6. **Chemical Usage:** The Discharger has reported in a Chemical Substance Use Questionnaire (CSUQ) that it used and stored volatile organic compounds (VOCs), namely perchloroethylene (PCE), trichloroethylene (TCE) and 1,1,1-trichloroethane (1,1,1-TCA), and petroleum hydrocarbons at the Site. The Discharger also has reported using heavy metal compounds, including chromium, in a metal plating operation.

EVIDENCE OF CONTAMINATION AND BASIS FOR 13304 ORDER

7. **Waste Releases:** Under the direction of the Regional Board, the Discharger has conducted extensive Site investigations since 1984 that documented the release of chemicals beneath the Site. At the Eastern Parcel (Home Depot Site), 13,620 cubic yards of shallow soil impacted with petroleum hydrocarbons (TPH) were excavated to a depth of 40 feet, treated by low temperature thermal desorption and reused to backfill the excavation. At the Western Parcel (Public Storage, Inc.), VOCs in the soil were remediated by soil vapor extraction (SVE). In addition, heavy metals

(primarily chromium) were identified and a limited cleanup was performed by removal and off-site disposal of the top 10 feet (approximately 20 cubic yards) of chromium contaminated soils.

The Site had maximum historical soil gas concentrations of TCE at 515 micrograms per liter (µg/L), and 1,1,1-TCA at 59 µg/L. Soil matrix concentrations for total chromium at 1,700 milligrams per kilogram (mg/Kg) and hexavalent chromium (Cr VI) at 606 mg/Kg were detected. PCE and dichloroethylene (DCE) were detected at much lower concentrations. Groundwater monitoring has been conducted at the site since 1991 (See Attachment C: Groundwater Plume Map). Maximum groundwater concentrations of TCE at 11,000 µg/L, TCA at 140 µg/L, total chromium at 5,810 µg/L and Cr VI at 4,610 µg/L was detected.

8. **Emerging Chemicals:** According to Regional Board records, the Discharger has not tested the Site for emerging chemicals 1,4-dioxane and 1,1,1-trichloropropane, chemical stabilizers often used with TCE, PCE and 1,1,1-TCA, and perchlorate, and nitrosodimethylamine (NDMA).

9. **Regulatory Status:** The Discharger has been required by Regional Board Staff to complete site assessment and remedial cleanup and has completed an investigation of the extent of contamination on site. The Discharger has also submitted a Remedial Action Plan (RAP) to address the cleanup of soil contamination at the Site. SVE system was installed and operated at the two parcels now owned by Home Depot and Public Storage, Inc. These parcels have received "no further action" letters for soil cleanup. In addition, the Discharger removed approximately 20 cubic yards of chromium contaminated soil. SVE is currently on going at the Kaiser property. Site investigations directed by the Regional Board were done pursuant to section 13267 of the California Water Code. The purpose of this Cleanup and Abatement Order (CAO) is to ensure that the Discharger completes assessment and remediation of emerging chemicals in the unsaturated zone, performs periodic groundwater monitoring, and undertakes cleanup of groundwater contaminants. This assessment and cleanup effort is being coordinated with USEPA efforts to remediate groundwater in the NHOU.

   USEPA has designated several potentially responsible parties liable for remedial action costs in the NHOU. At the present time, USEPA has reached an agreement whereby responsible parties in the NHOU will share costs and implement the interim remedial action plan. The Discharger has been named as a responsible party for VOC cleanup of groundwater in the NHOU.

10. **Sources of Information:** The sources for the evidence summarized above include but are not limited to: various technical reports submitted by the Discharger or its representatives to the Regional Board from 1984 through 2002; site inspections, meetings, written letters and telephone communications between Regional Board staff and the Discharger or its representatives from 1984 through 2002.

CONCLUSION

11. **Pollution of Waters of the State:** The unauthorized discharge of wastes by the Discharger within the NHOU was not permitted and is in violation of water quality objectives established in the ***Basin Plan***. The past activities of the Discharger have contaminated the underlying soil and continues to threaten groundwater within and outside the NHOU.

12. **Regional Board Authority:** Section 13304 of the California Water Code states, in part, that:

"Any person... who has caused or permitted... any waste to be discharged or deposited where it is, or probably will be, discharged into the waters of the state and creates, or threatens to create, a condition of pollution or nuisance, shall upon order of the regional board, clean up such waste or abate the effects of the waste, or, in the case of threatened pollution or nuisance, take other necessary remedial action."

The purpose of this CAO is to ensure that the Discharger mitigates the above-mentioned soil and groundwater contamination by completing off-site assessments of, performing periodic monitoring of, and cleaning up contaminant discharges to soil and groundwater at the Site.

13. **Status of Site Cleanup:** The Discharger has performed assessment and limited cleanup of contaminated soil beneath their property within the NHOU.

    To complete subsurface assessments and begin appropriate cleanup, the Discharger must undertake the actions specified below, at a minimum:

    a. For emerging chemicals and heavy metals in the unsaturated zone: Complete a work plan to assess the lateral and vertical extent of the contamination and the probability of its migration to groundwater.

    b. For emerging chemicals and heavy metals in the saturated zone: Complete the Site assessment including any off-site migration of contaminants in the saturated zone.

14. **Cleanup Goals:** Pending completion of adequate assessment and monitoring of the lateral and vertical extent of soil contamination, and the fate and transport and risk of migration to groundwater, the following information shall be considered when establishing preliminary cleanup goals.

    a. Develop a remedial action plan as necessary to cleanup soil and groundwater contamination using at a minimum, the criteria stated in items b, c and d, below

    b. VOCs in the Unsaturated Zone: Cleanup levels set forth in the ***Interim Site Assessment & Cleanup Guidebook,*** dated May 1996, prepared by the California Regional Water Quality Control Board, Los Angeles Region. The Guidebook considers depth to the water table, the nature of the chemicals, the fate and transport in the environment, soil conditions and texture, and attenuation trends.

    c. Emerging Chemicals and Heavy Metals: Concentrations shall not exceed Action Levels or MCLs for drinking water as established by the State Department of Health Services, for contaminants in the saturated zone. For emerging chemicals in the unsaturated zone, the Discharger will need to investigate if contaminants are present and the extent to which they may attenuate through the soil in order to determine soil cleanup levels that will not impact the underlying groundwater resources above Action Levels or MCLs. Residual heavy metal concentrations in the leachate released from the vadose zone that will be protective of underlying groundwater also known as "soluble designated levels" can be determined by following the guidance document " ***Staff Report, The Designated Level Methodology For Waste Classification and Cleanup Level Determination***" dated October 1986 and Updated June 1989, that was published by the California Regional Water Quality Control Board, Central Valley Region.

d. VOCs in the Saturated Zone: Action Levels and MCLs for drinking water as established by the State Department of Health Services.

e. Pending completion of contaminant assessments, Regional Board staff may consider revised cleanup goals in accordance with the following State Policies:

"Antidegradation Policy" (State Board Resolution No 68-16), which requires attainment of background levels of water quality, or the highest level of water quality that is reasonable in the event that background levels cannot be restored. Cleanup levels other than background must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses of water, and not result in exceedance of water quality objectives in the ***Basin Plan***.

"Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304" (State Board Resolution No. 92-49), which sets forth criteria to consider for those cases of pollution wherein restoration of water quality to background levels may not be reasonable.

15. **Impairment of Drinking Water Wells:** As noted above (Finding No. 2), some of the drinking water wells in San Fernando Valley have been impacted by chromium. For example, chromium and VOCs have impacted the Glendale Treatment Plant (Plant) extraction wells. However, the plant is designed only for the treatment of VOCs in groundwater, not heavy metals. Water purveyors and their customers might have to bear a significant portion of the costs of cleaning up this contaminated groundwater and/or procuring alternative supplies of drinking water.

16. Pursuant to section 13304 of the California Water Code, regional boards may require reimbursement for all reasonable costs to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action.

17. This action is being taken for the protection of the environment and as such is exempt from the provisions of the California Environmental Quality Act (Public Resources Code section 21000 et seq.) in accordance with California Code of Regulations, title 14, section 15321.

IT IS HEREBY ORDERED, pursuant to section 13304 of the California Water Code, that the Discharger, HONEYWELL INTERNATIONAL INC. (formerly ALLIED SIGNAL, INC.), shall cleanup and abate contaminated soil and groundwater emanating from the Discharger's Site at 11600 Sherman Way, North Hollywood, California, in accordance with the following requirements:

1. **VOCs in the Unsaturated Zone:** The Discharger shall continue with the cleanup of VOCs in the unsaturated zone .

2. **Emerging Chemicals and Heavy Metals in the Unsaturated and Saturated Zones:** The Discharger shall prepare a workplan for additional on-site and off-site subsurface assessment of soil and groundwater, as necessary, to determine lateral and vertical extent of heavy metals and emerging chemicals including Cr VI, 1,4-dioxane, 1,2,3-trichloropropane, and perchlorate. Regional Board records indicates that previous investigations were conducted in 1993 to determine the on-site extent of chromium contamination in soil in the Western Parcel of the Site. Therefore, the Discharger will only be required to perform additional site assessment for other

emergent chemicals in soil and chromium at any remaining uninvestigated source locations, if necessary. The workplan shall be submitted to the Regional Board and implemented upon approval from the Regional Board Executive Officer (Executive Officer) according to the schedule in Attachment C.

3. **Assessment Technical Report/Remedial Action Plans:** Upon completion of this assessment (i.e., Requirements 1 and 2 above), the Discharger shall prepare a technical report that summarizes the results. In the event that results fail to confirm that:

   a. VOCs and emerging chemicals in the unsaturated zone are below the residual concentrations protective of groundwater quality and will be naturally attenuating to MCLs at the water table, the Discharger shall develop and implement a workplan, subject to Executive Officer's approval for cleaning up soil contaminants; and

   b. Emerging chemicals and heavy metals in the saturated zone are below the MCLs or action levels and are continuing to migrate, the Discharger shall develop and implement a workplan subject to the Executive Officer's approval for containment, control and cleanup of groundwater pollution.

4. **Groundwater Monitoring:** The Discharger shall monitor the groundwater for chemicals of concern, at a minimum including chromium and CrVI and the emerging chemicals, 1,4- dioxane, nitrosodimethyl amine (NDMA), perchlorate, and 1,2,3-trichloropropane, on a quarterly basis (See Attachment B: Figure 3). Figure 3 in Attachment B shows the total and hexavalent chromium data obtained from the February 2001 groundwater monitoring event and an approximate CrVI isoconcentration map drawn by the Regional Board staff. The isoconcentration map shows offsite migration of the CrVI groundwater plume toward southwest across the Southern Pacific Railroad Right of Way. This offsite migration might have contributed to the above-MCL CrVI contamination of North Hollywood Operable Unit wells. The City of Los Angeles Department of Water and Power (LADWP) installed the wells.

   Future groundwater monitoring frequency may be adjusted if a plan is proposed by the Discharger and subsequently approved by the Executive Officer. The Executive Officer may approve a change in the monitoring frequency if it is shown that other frequencies are adequate to monitor changes of contaminant concentrations, groundwater gradients, and the progress of any soil and groundwater remediation.

   Destruction of any groundwater wells installed during the required investigation and remediation for this project must be reported to and approved by the Executive Officer in advance. Any groundwater monitoring well removed must be replaced within three months at a location approved by the Executive Officer. With justification, the Executive Officer may approve the abandonment of groundwater monitoring wells without replacement. When a well is removed, all work shall be completed in accordance with all applicable well abandonment requirements. Copies of well abandonment permits are to be provided to the Executive Officer.

5. **Impairment of Drinking Water Wells:** The Regional Board reserves the right to require the Discharger and other dischargers to develop and implement a plan that will mitigate impaired resources of groundwater and/or compensate purveyors for costs of replacing impaired water supplies. Such a directive will not duplicate any USEPA requirements.

6. **Contractor/Consultant Qualification:** A California registered civil engineer, registered geologist or registered certified specialty geologist shall conduct or direct the subsurface investigation and cleanup program. All technical documents shall be signed by and stamped with the seal of the above-mentioned qualified professionals.

7. **Cost Recovery:** The Discharger shall reimburse the Regional Board all reasonable costs incurred by the Regional Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial actions.

8. **Time Schedule:** The Discharger shall submit all required work plans and reports within the time schedule listed in Attachment C.

9. The Regional Board's authorized representative(s) shall be allowed:

   - Entry upon premises where a regulated facility or activity is located or conducted, or where records are stored, under the conditions of this CAO;
   - Access to copy any records that are stored under the conditions of this CAO;
   - Access to inspect any facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this CAO; and
   - The right to photograph, sample, and monitor the Site for the purpose of ensuring compliance with this CAO, or as otherwise authorized by the California Water Code.

10. This CAO is not intended to permit or allow the Discharger to cease any work required by any other order issued by this Regional Board, nor shall it be used as a reason to stop or redirect any investigation or cleanup or remediation programs ordered by this Regional Board or any other agency.

    Furthermore, this CAO does not exempt the Discharger from compliance with any other laws, regulations, or ordinances which may be applicable, nor does it legalize these waste treatment and disposal facilities, and it leaves unaffected any further restrictions on those facilities which may be contained in other statues or required by other agencies.

11. The Discharger shall submit 30-day advance notice to the Regional Board of any planned changes in name, ownership, or control of the Site; and shall provide 30-day advance notice of any planned physical changes to the Site that may affect compliance with this CAO. In the event of a change in ownership or operator, the Discharger also shall provide 30-day advance notice, by letter, to the succeeding owner/operator of the existence of this CAO, and shall submit a copy of this advance notice to the Regional Board.

12. The Regional Board, through its Executive Officer, may revise this CAO as additional information becomes available. Upon request by the Discharger, and for good cause shown, the Executive Officer may defer, delete or extend the date of compliance for any action required of the Discharger under this CAO. The authority of the Regional Board, as contained in the California Water Code, to order investigation and cleanup in addition to that described herein is in no way limited by this CAO.

13. Pursuant to California Water Code section 13320, the Discharger may seek review of this CAO by filing a petition with the State Water Resources Control Board (State Board). Such a petition

must be received by the State Board at P.O. Box 100, 1001, I Street, Sacramento, California, 95814, within 30 days of the date of this CAO.

14. Failure to comply with the terms of conditions of this CAO may result in imposition of civil liabilities either administratively by the Regional Board or judicially by the Superior Court in accordance with section 13350 et seq. of the California Water Code, and/or referral to the Attorney General of the State of California for such action as he/she may deem appropriate.

15. None of the obligations imposed by this CAO on the Discharger is intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations are imposed pursuant to the police powers of the State of California intended to protect the public health, safety, welfare and environment.

Ordered by: _____ Date: February 21, 2003
Dennis A. Dickerson, Executive Officer

Attachment A (Site Vicinity Map and Site Plot Plan)

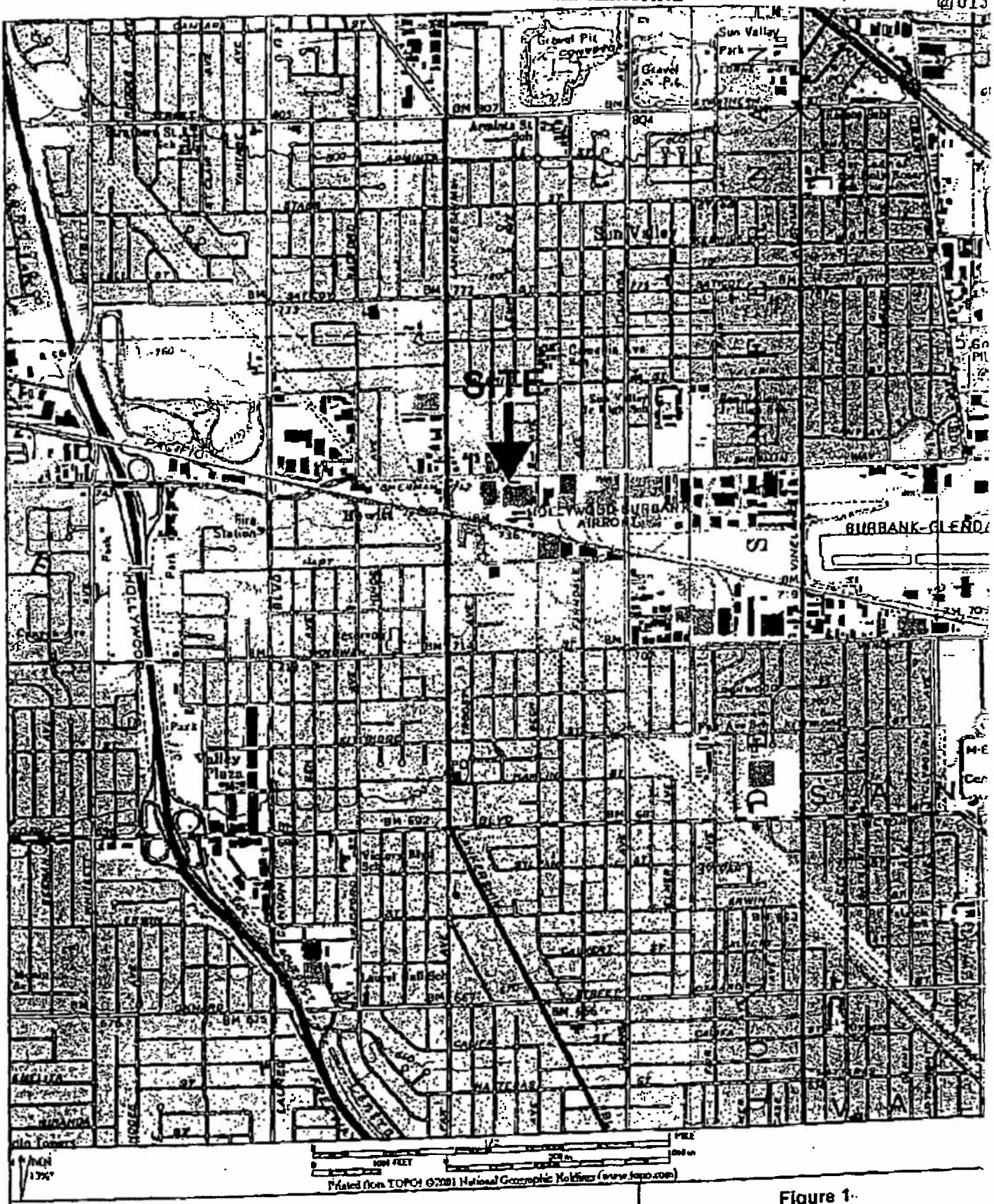


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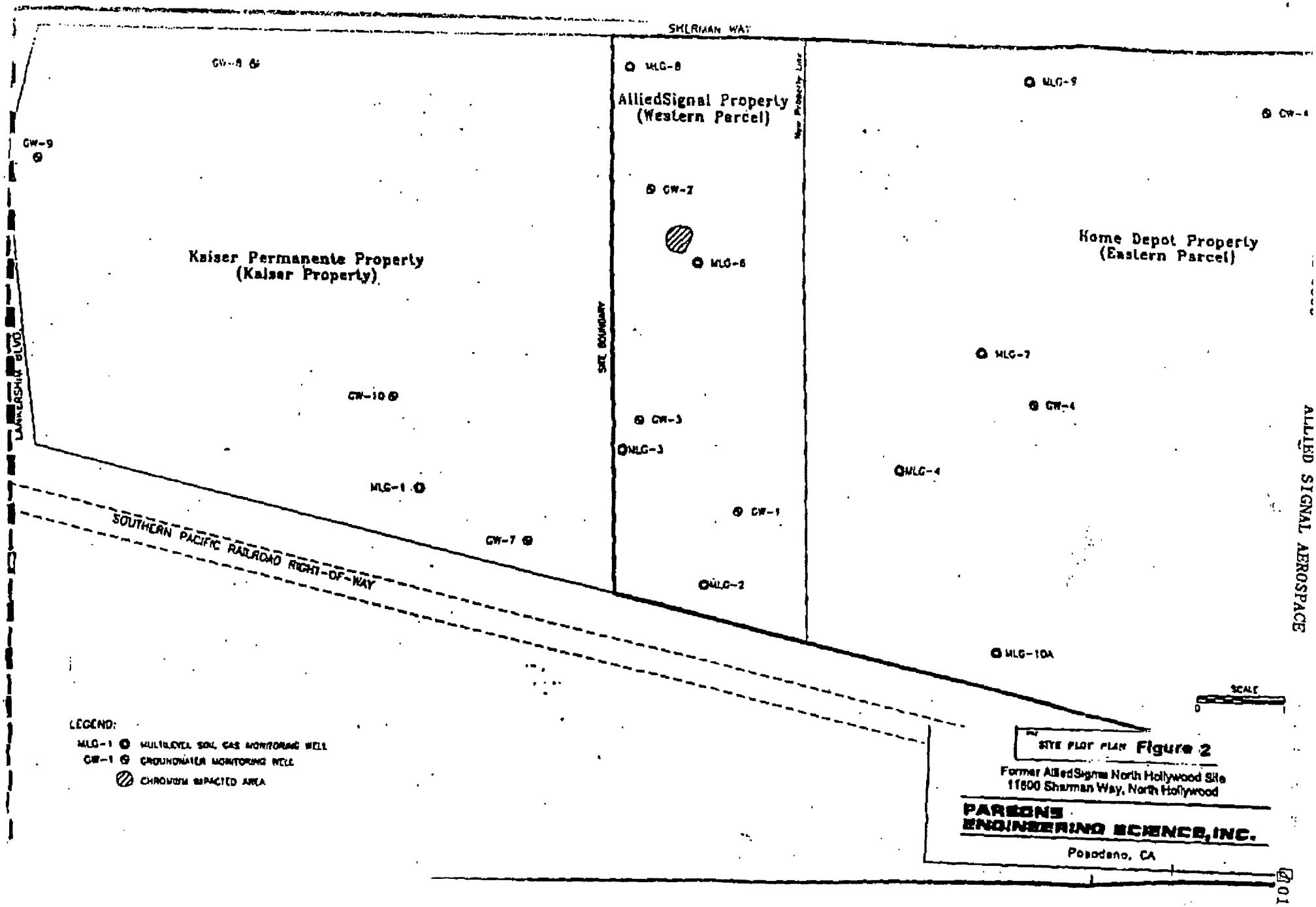
Figure 1

Site Vicinity Map

Honeywell North Hollywood

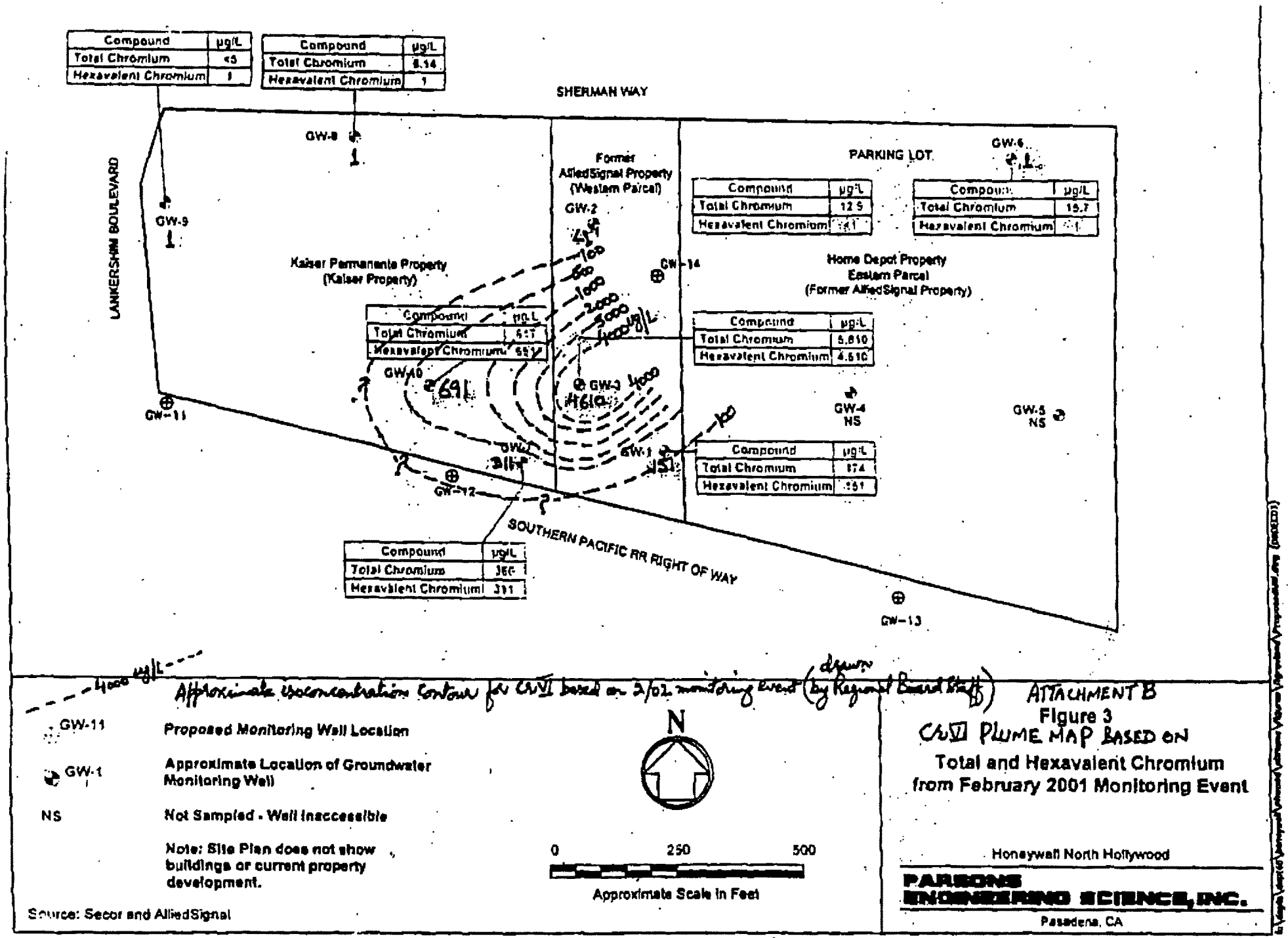
PARSONS ENGINEERING SCIENCE, INC

Pasadena, CA



ALLIED SIGNAL AEROSPACE

Attachment B: Figure 3 (Total and Hexavalent Chromium from February 2001 Monitoring Event) and Cr VI Groundwater Plume Map



ATTACHMENT B
Figure 3
CrVI PLUME MAP BASED ON
Total and Hexavalent Chromium
from February 2001 Monitoring Event

Honeywell North Hollywood

PARSONS ENGINEERING SCIENCE, INC.
Pasadena, CA

ALLIED SIGNAL AEROSPACE

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Attachment C: Time Schedule

	Directive	Completion/Due Date
1.	**Determine lateral and vertical extent of Emerging chemicals and Heavy Metals in the Unsaturated Zone**	
	Submit a workplan for assessment of Emerging chemicals and heavy metals	March 31, 2003
	Complete assessment.	To be determined pending submittal of workplan
	Submit technical report.	To be determined
2.	**Determine onsite and offsite lateral and vertical extent of Emerging Chemicals and heavy metals in the Saturated Zone**	
	Submit a workplan for assessment	March 31, 2003
	Complete assessment	To be determined in workplan
	Submit technical report	To be determined
3.	**Groundwater Monitoring**	
	Submit Quarterly monitoring Reports	Reports due by the following dates:
	January - March	April 15
	April – June	July 15
	July – September	October 15
	October – December	January 15
4.	**Remedial Action Plan**	
	Soil	To be determined
	Groundwater	To be determined

California Regional Water Quality Control Board

Los Angeles Region

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Alston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

PSI Document 34.4

May 27, 2003

Mr. Benny DeHghi
Manager, Remediation
Honeywell International Incorporated
2525 West 190th Street
Torrance, CA 90504-6099

COMMENTS ON THE TECHNICAL REPORT AND REMEDIAL INVESTIGATION WORKPLAN FOR CHROMIUM, IN ADDITION TO THE ASSESSMENT WORKPLAN ADDENDUM FOR EMERGING CHEMICALS IN THE UNSATURATED AND SATURATED ZONES, HONEYWELL INTERNATIONAL INC. (FORMERLY ALLIED SIGNAL INC.), 11600 SHERMAN WAY, NORTH HOLLYWOOD, CALIFORNIA (FILE NO. 111.0180)

Dear Mr. DeHghi:

A Cleanup and Abatement Order No. R4-2003-0037 (Order) was issued by this Regional Board directing Honeywell International Inc. (formerly Allied Signal Inc.) to assess, cleanup and abate the effects of contamination discharged to soil and groundwater at the facility identified above. Regional Board staff received your December 7, 2001 *Technical Report and Remedial Investigation Workplan for Chromium* on June 21, 2002, and your March 31, 2003 *Assessment Workplan Addendum - Emerging Chemicals and Chromium in Unsaturated and Saturated Zones* and a copy of your December 7, 2001 workplan on April 1, 2003. Based on our review of the workplans, Regional Board staff approves the workplan subject to compliance with the following conditions:

1. Based on review of the previous investigation reports, Regional Board staff has modified the number and locations of the proposed boring and requires the advancement of the borings at the following locations:

   a) Location of deep boring PBP1-01 to be drilled and sampled into the saturated zone is approved since it is located adjacent to SBP1-073 where maximum hexavalent chromium concentration was encountered. This boring should be converted to a groundwater monitoring well. The locations of borings PBP1-02 and PBP1-04 are appropriate. Move the location of boring PBP1-03 12 feet toward northwest.

   b) Advance additional borings at the following locations:
      i) In the former Above Ground Wastewater Clarifier area approximately 12 feet southeast of SBP1-06.
      ii) In the former Cyanide Destruction, Chromium Reduction & Associated Chemical Tanks area, 10 feet east of SBP1-05.

ORIGINAL

iii) In the former Oil Quench Pit area, east of SBP1-58 and adjacent to the sewer lines. Provide alternate locations if access by a drilling rig (inside the Public Storage building) would be a problem.

iv) In the Sump area, 10 feet southeast of SBP1-34. Provide alternate locations as mentioned in (iii) above.

v) Northwest of Vapor Degreaser No.2, 15 feet west of SBP1-39B.

vi) Near Clarifier No. 2, 8 feet northwest of SBP1-63.

vii) At the location of the former above ground tank (AGT) No. 10, 8 feet north-northeast of SBP1-61.

viii) In the Gold Plating area, approximately 60 feet east-southeast of SBP1-02.

ix) Install a groundwater monitoring well at the location of SBP2-23B in the former Plant 2 Plating area. If the lateral and vertical extent of chromium contaminated soil has been already determined, remediate the contaminated soil in the Plant 2 Source area, so that the residual contamination in the vadose zone will not threaten underlying groundwater quality.

x) After obtaining the analytical results from soil and groundwater sampling activities, provide iso-concentration maps to depict contaminant plume delineations in the soil and groundwater. Compile the obtained information into a technical report containing the results of the investigations. Along with the technical report, submit a *Vadose Zone Soil Remediation Workplan* to Regional Board staff for review and approval.

2. **Section 4.1.1, Paragraph 2**: Regional Board staff only considers analyses performed by a California certified laboratory to be representative. You are, therefore, required to use such laboratories for all analyses.

3. **Section 4.1.1, Paragraph 3 and 4**: Instead of using the synthetic precipitation leaching procedure (SPLP), perform California Waste Extraction Test (WET) (Title 22, California Code of Regulations δ 66700) on the most contaminated soil samples, and then compare the analytical results with soluble designated level (SDL). The soluble designated level is calculated by multiplying water quality goal for the metal (i.e., maximum contaminant level or MCL) by the attenuation factor, and dividing by 10. If the WET result exceeds the SDL, the contaminant will be considered a threat to underlying groundwater quality, and thereby a designated waste. Collect paired soil and groundwater samples from the saturated zone at 10-foot intervals rather than 20-foot intervals.

4. **Section 4.1.2, Paragraphs 1 and 2**: Provide more information on the boring logs such as depth to the top of groundwater and stabilized static water level data.

5. **Section 4.2.1**: An appropriate number of groundwater monitoring wells are needed to delineate the chromium and other emergent chemical plumes. Use iso-concentration maps to depict lateral extent. Regional Board staff approves your proposal to install one onsite and three offsite wells

at the approved locations. However, move the location of proposed well GW-12 approximately 200 feet southward, since it is located very close to the existing well GW-7.

Start providing quarterly data for monitoring groundwater monitoring wells GW-4 and GW-5 because of their proximity to the Plant 2 source area. An additional groundwater monitoring well will not be required if GW-5 is located downgradient of boring SBP2-23B in the Plant 2 source area within 100 feet as required in item 1., subpart vii) listed above.

6. **Section 4.2.3, Paragraph 2**: Instead of using a 145-foot screen interval for each proposed groundwater monitoring well, use a nested well with three screened intervals, each not more than 30 feet in length. Such a nested multi-screened well will help in defining vertical extent of the chromium plume as well as prevent the collection of diluted and, probably unrepresentative groundwater samples, from an excessively large screen interval in the well.

7. Analyze all soil and groundwater samples for Title 22 heavy metals, including total and hexavalent chromium and the specified emergent chemicals.

8. We have recently received a letter from Los Angeles Department of Water and Power (LADWP) urging immediate groundwater remedial action to prevent any further migration of the hexavalent chromium plume from your site towards North Hollywood Operable Unit (NHOU) wells. The NHOU remedy consists of a system of seven extraction wells and a treatment facility that removes volatile organic compounds (VOCs) from the aquifer. LADWP operates and maintains the NHOU remedy on behalf of the United States Environmental Protection Agency (USEPA). Based on the presence of elevated concentrations of hexavalent and total chromium in your downgradient monitoring wells, the LADWP considers your site to be the source of chromium contamination in their NHOU Well No. 2 and other downgradient NHOU wells. LADWP had to recently remove NHOU Well No. 2 from service because of the presence of high total and hexavalent chromium concentrations. According to their letter, LADWP and USEPA have been planning to enhance the effectiveness of the NHOU remedy with the addition of two or three new NHOU wells in the vicinity of NHOU Well No. 2. However, they both decided not to implement the plan until the source of chromium contamination is remediated or removed.

   You are, therefore, required to submit an interim groundwater remedial action plan (IGWRAP) by **June 30, 2003** to this Regional Board for review and approval. The IGWRAP must propose the design and implementation of an interim remedial measure for preventing further offsite migration of chromium groundwater plume from your site towards the NHOU wells. Regional Board staff will consider this IGWRAP to be a part of the remedial action plan required under the Cleanup and Abatement Order. This IGWRAP shall be subject to modification, as more information from your site becomes available.

9. You are required to proceed with the fieldwork and submit a revised workplan in accordance with the above comments along with a schedule by **June 30, 2003.**

Should you have questions or wish to discuss details, please contact Mr. Dixon Oriola at (213) 576-6803 or Mr. Mohammad Zaidi at (213) 576-6732.

Sincerely,

Dennis A. Dickerson
Executive Officer

cc: Robert Sams, State Water Resources Control Board, Office of Chief Counsel
Michael Lauffer, State Water Resources Control Board, Office of Chief Counsel
Sayareh Amirebrahimi, State Department of Toxic Substances Control, Glendale Office
Vera Melnyk-Vecchio, State Department of Health Services, Drinking Water Field Operations Branch
David Stensby, US Environmental Protection Agency
Bob Fitzgerald, US Environmental Protection Agency
Mel Blevins, Upper Los Angeles River Area Watermaster
Donald R. Froelich, City of Glendale
Gerald A. Gewe, City of Los Angeles Department of Water and Power
Fred Lantz, City of Burbank
John Sambuco, Public Storage, Laguna Hills, California
Scott Sobeck, Home Depot, Orange California
Helen Ku, Kaiser Permanente, Pasadena, California